



QUARTERLY STATEMENT

As of September 30, 2015
of the Condition and Affairs of the

American Commerce Insurance Company

NAIC Group Code.....411, 411 (Current Period) (Prior Period)	NAIC Company Code..... 19941	Employer's ID Number..... 31-4361173
Organized under the Laws of OHIO	State of Domicile or Port of Entry OHIO	Country of Domicile US
Incorporated/Organized..... September 18, 1946	Commenced Business..... March 19, 1947	
Statutory Home Office	3590 TWIN CREEKS DRIVE..... COLUMBUS OH US 43218-2579 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	
Main Administrative Office	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Mail Address	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)</i>	
Primary Location of Books and Records	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Internet Web Site Address	www.mapfreinsurance.com	
Statutory Statement Contact	CHRISTINE A MULCAHY <i>(Name)</i> cmulcahy@mapfreusa.com <i>(E-Mail Address)</i>	508-943-9000-14376 <i>(Area Code) (Telephone Number) (Extension)</i> 508-949-4246 <i>(Fax Number)</i>

OFFICERS

Name	Title	Name	Title
1. JAIME TAMAYO	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. ROBERT EDWARD MCKENNA	TREASURER, CAO, & SVP	4. RANDALL VAUGHN BECKER	EXECUTIVE VICE PRESIDENT & CFO

OTHER

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	DAVID HILL COCHRANE	DENNIS JOHN CROSSLEY	FREDERICK LAWRENCE GRUEL
TIMOTHY JOHN MORGAN	DANIEL PATRICK OLOHAN	MARK ALLEN SHAW	MARK HARRY SHAW
JAIME TAMAYO			

State of..... MASSACHUSETTS
County of..... WORCESTER

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

_____ (Signature) JAIME TAMAYO 1. (Printed Name) PRESIDENT & CEO _____ (Title)	_____ (Signature) DANIEL PATRICK OLOHAN 2. (Printed Name) SECRETARY, GENERAL COUNSEL, & EVP _____ (Title)	_____ (Signature) ROBERT EDWARD MCKENNA 3. (Printed Name) TREASURER, CAO, & SVP _____ (Title)
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Subscribed and sworn to before me
This _____ day of _____

a. Is this an original filing? Yes [X] No []
b. If no: 1. State the amendment number _____
2. Date filed _____
3. Number of pages attached _____

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	135,469,606		135,469,606	151,287,250
2. Stocks:				
2.1 Preferred stocks.....	1,474,300		1,474,300	2,312,700
2.2 Common stocks.....			.0	
3. Mortgage loans on real estate:				
3.1 First liens.....			.0	
3.2 Other than first liens.....			.0	
4. Real estate:				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....	1,480,729		1,480,729	1,502,792
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			.0	
4.3 Properties held for sale (less \$.....0 encumbrances).....			.0	
5. Cash (\$.....(3,147,505)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(3,147,505)		(3,147,505)	(83,835)
6. Contract loans (including \$.....0 premium notes).....			.0	
7. Derivatives.....			.0	
8. Other invested assets.....			.0	
9. Receivables for securities.....			.0	
10. Securities lending reinvested collateral assets.....			.0	
11. Aggregate write-ins for invested assets.....	.0	.0	.0	.0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	135,277,130	.0	135,277,130	155,018,907
13. Title plants less \$.....0 charged off (for Title insurers only).....			.0	
14. Investment income due and accrued.....	1,157,791		1,157,791	1,339,768
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	83,959,499		83,959,499	59,478,457
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....0 earned but unbilled premiums).....			.0	
15.3 Accrued retrospective premiums.....			.0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	22,943,235		22,943,235	18,032,846
16.2 Funds held by or deposited with reinsured companies.....			.0	
16.3 Other amounts receivable under reinsurance contracts.....			.0	
17. Amounts receivable relating to uninsured plans.....			.0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....	2,426,702		2,426,702	
18.2 Net deferred tax asset.....	8,149,698	418,486	7,731,212	5,009,075
19. Guaranty funds receivable or on deposit.....			.0	
20. Electronic data processing equipment and software.....	17,099		17,099	81,546
21. Furniture and equipment, including health care delivery assets (\$.....0).....	852,503	852,503	.0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			.0	
23. Receivables from parent, subsidiaries and affiliates.....			.0	4,050,866
24. Health care (\$.....0) and other amounts receivable.....			.0	
25. Aggregate write-ins for other than invested assets.....	79,585,014	2,476,940	77,108,074	67,445,218
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	334,368,671	3,747,929	330,620,742	310,456,683
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			.0	
28. Total (Lines 26 and 27).....	334,368,671	3,747,929	330,620,742	310,456,683

DETAILS OF WRITE-INS

1101.....			.0	
1102.....			.0	
1103.....			.0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	.0	.0	.0	.0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	.0	.0	.0	.0
2501. Prepaid expenses.....	1,746,847	1,746,847	.0	
2502. Equity in pools and associations.....	76,562,767		76,562,767	67,441,202
2503. Arizona renewal business.....	730,093	730,093	.0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	545,307	.0	545,307	4,016
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	79,585,014	2,476,940	77,108,074	67,445,218

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$....34,559,000).....	71,763,389	63,120,672
2. Reinsurance payable on paid losses and loss adjustment expenses.....	11,864,076	10,333,598
3. Loss adjustment expenses.....	15,868,062	13,820,472
4. Commissions payable, contingent commissions and other similar charges.....	5,443,827	4,329,608
5. Other expenses (excluding taxes, licenses and fees).....	1,833,636	925,407
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	137,516	1,106,381
7.1 Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....		1,249,812
7.2 Net deferred tax liability.....		
8. Borrowed money \$.....0 and interest thereon \$.....0.....		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$....242,605,242 and including warranty reserves of \$.....0 and accrued accident and health experience rating refunds including \$.....0 for medical loss ratio rebate per the Public Health Service Act.....	94,175,007	87,120,649
10. Advance premium.....	7,404,715	4,141,520
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	24,810,322	18,868,158
13. Funds held by company under reinsurance treaties.....		
14. Amounts withheld or retained by company for account of others.....		
15. Remittances and items not allocated.....		
16. Provision for reinsurance (including \$.....0 certified).....		
17. Net adjustments in assets and liabilities due to foreign exchange rates.....		
18. Drafts outstanding.....		
19. Payable to parent, subsidiaries and affiliates.....	2,434,303	
20. Derivatives.....		
21. Payable for securities.....	1,042,530	
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	1,379,128	1,756,198
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	238,156,511	206,772,475
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	238,156,511	206,772,475
29. Aggregate write-ins for special surplus funds.....	0	0
30. Common capital stock.....	3,226,140	3,226,140
31. Preferred capital stock.....		
32. Aggregate write-ins for other than special surplus funds.....	0	0
33. Surplus notes.....		
34. Gross paid in and contributed surplus.....	26,188,147	26,188,147
35. Unassigned funds (surplus).....	63,049,944	74,269,921
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....		
36.20.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36).....	92,464,231	103,684,208
38. Totals (Page 2, Line 28, Col. 3).....	330,620,742	310,456,683

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,374,574	1,729,385
2502. Premium tax payable - Global.....		26,813
2503. Miscellaneous liability.....	4,554	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	1,379,128	1,756,198
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

American Commerce Insurance Company

STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$.....275,862,693).....	227,385,323	208,507,418	281,305,579
1.2 Assumed..... (written \$.....149,582,443).....	140,718,307	127,762,648	172,354,580
1.3 Ceded..... (written \$.....278,137,739).....	227,850,591	208,507,418	282,001,191
1.4 Net..... (written \$.....147,307,397).....	140,253,039	127,762,648	171,658,968
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....99,605,000):			
2.1 Direct.....	168,099,818	144,246,420	187,760,442
2.2 Assumed.....	102,403,031	84,563,308	112,204,796
2.3 Ceded.....	168,099,818	144,246,420	187,760,442
2.4 Net.....	102,403,031	84,563,308	112,204,796
3. Loss adjustment expenses incurred.....	18,395,147	14,095,533	19,258,821
4. Other underwriting expenses incurred.....	37,155,985	36,776,215	48,201,550
5. Aggregate write-ins for underwriting deductions.....	0	0	(15,925)
6. Total underwriting deductions (Lines 2 through 5).....	157,954,163	135,435,056	179,649,242
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(17,701,124)	(7,672,408)	(7,990,274)
INVESTMENT INCOME			
9. Net investment income earned.....	4,095,373	4,540,178	6,556,436
10. Net realized capital gains (losses) less capital gains tax of \$.....390,915.....	868,817	1,415,816	2,155,616
11. Net investment gain (loss) (Lines 9 + 10).....	4,964,190	5,955,994	8,712,052
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$.....0 amount charged off \$.....0).....	0		
13. Finance and service charges not included in premiums.....	1,804,681	1,716,417	2,292,127
14. Aggregate write-ins for miscellaneous income.....	40,573	60,432	111,218
15. Total other income (Lines 12 through 14).....	1,845,254	1,776,849	2,403,345
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	(10,891,680)	60,435	3,125,123
17. Dividends to policyholders.....			
18. Net income after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	(10,891,680)	60,435	3,125,123
19. Federal and foreign income taxes incurred.....	(2,807,172)	(352,188)	66,823
20. Net income (Line 18 minus Line 19) (to Line 22).....	(8,084,508)	412,623	3,058,300
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	103,684,208	111,994,650	111,994,650
22. Net income (from Line 20).....	(8,084,508)	412,623	3,058,300
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....(186,330).....	(346,041)	(509,729)	(493,176)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	2,804,313	296,485	(184,438)
27. Change in nonadmitted assets.....	(536,801)	(769,183)	(261,332)
28. Change in provision for reinsurance.....			
29. Change in surplus notes.....			
30. Surplus (contributed to) withdrawn from protected cells.....			
31. Cumulative effect of changes in accounting principles.....			
32. Capital changes:			
32.1 Paid in.....			
32.2 Transferred from surplus (Stock Dividend).....			
32.3 Transferred to surplus.....			
33. Surplus adjustments:			
33.1 Paid in.....			
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....		(11,199,465)	(11,199,465)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	(5,056,940)	461,825	769,669
38. Change in surplus as regards policyholders (Lines 22 through 37).....	(11,219,977)	(11,307,444)	(8,310,442)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	92,464,231	100,687,206	103,684,208
DETAILS OF WRITE-INS			
0501. LAD program income.....			(15,925)
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	0	0	(15,925)
1401. Miscellaneous income.....	28,538	30,505	45,731
1402. Gain on sale of fixed assets.....	12,035	29,927	29,926
1403. Other technical income (other reinsurer).....			33,061
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	2,500
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	40,573	60,432	111,218
3701. STATUTORY POOLING ADJUSTMENT.....	(3,630,861)	461,825	769,669
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....	(1,426,079)		
3703.			
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0	0
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	(5,056,940)	461,825	769,669

CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	132,031,714	134,062,089	174,374,393
2. Net investment income.....	4,617,987	4,848,690	7,002,021
3. Miscellaneous income.....	1,845,254	1,776,849	2,403,345
4. Total (Lines 1 through 3).....	138,494,955	140,687,628	183,779,759
5. Benefit and loss related payments.....	97,140,225	80,379,162	105,836,502
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	52,449,959	53,234,452	68,628,318
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$..... 1,108,149 tax on capital gains (losses).....	1,260,257	598,755	776,794
10. Total (Lines 5 through 9).....	150,850,441	134,212,369	175,241,614
11. Net cash from operations (Line 4 minus Line 10).....	(12,355,486)	6,475,259	8,538,145
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	57,906,700	34,446,604	57,216,164
12.2 Stocks.....	810,000	147,343	147,343
12.3 Mortgage loans.....			
12.4 Real estate.....			
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....			
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	58,716,700	34,593,947	57,363,507
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	41,575,990	40,673,636	50,937,045
13.2 Stocks.....		0	
13.3 Mortgage loans.....			
13.4 Real estate.....	75,879	44,089	44,089
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....	(1,042,530)		
13.7 Total investments acquired (Lines 13.1 to 13.6).....	40,609,339	40,717,725	50,981,134
14. Net increase or (decrease) in contract loans and premium notes.....			
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14).....	18,107,361	(6,123,779)	6,382,373
CASH FROM FINANCING AND MISCELLANEOUS SOURCES			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes.....			
16.2 Capital and paid in surplus, less treasury stock.....			
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			11,199,465
16.6 Other cash provided (applied).....	(8,815,545)	(6,200,456)	(11,350,599)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(8,815,545)	(6,200,456)	(22,550,064)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11 plus Line 15 plus Line 17).....	(3,063,670)	(5,848,975)	(7,629,546)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(83,835)	7,545,711	7,545,711
19.2 End of period (Line 18 plus Line 19.1).....	(3,147,505)	1,696,736	(83,835)

Note: Supplemental disclosures of cash flow information for non-cash transactions:

20.0001			
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NOTES TO FINANCIAL STATEMENTS

Note 1 - Summary of Significant Accounting Policies**A. Accounting Practices, Impact of NAIC/State Differences**

The accompanying financial statements of American Commerce Insurance Company (the Company) have been prepared in conformity with the accounting practices prescribed or permitted by the National Association of Insurance Commissioners (NAIC) and the State of Ohio. The NAIC Accounting Practices and Procedures manual, version effective January 1, 2001, (NAIC SAP) has been adopted as a component of prescribed or permitted practices by the State of Ohio.

There are no differences between Ohio prescribed practices and NAIC statutory accounting practices (NAIC SAP) as noted below:

	State	2015	2014
NET INCOME	OH		
1. Net Income, state basis		\$ (8,084,508)	\$ 3,058,300
2. Effect of state prescribed practices		-	-
3. Effect of state permitted practices		-	-
4. Net Income, NAIC SAP basis		\$ (8,084,508)	\$ 3,058,300
SURPLUS	OH		
5. Policyholders' surplus, state basis		\$ 92,464,231	\$ 103,684,208
6. Effect of state prescribed practices		-	-
7. Effect of state permitted practices		-	-
8. Policyholders' surplus, NAIC SAP basis		\$ 92,464,231	\$ 103,684,208

Note 2 - Accounting Changes and Corrections of Errors

No significant change.

Note 3 - Business Combinations and Goodwill

No significant change.

Note 4 - Discontinued Operations

No significant change.

Note 5 - Investments**D. Loan-backed Securities**

1. Prepayment assumptions are obtained from broker-dealer surveys, internal estimates or Bloomberg

This note is used to disclose any loan-backed security that has recognized an other-than-temporary impairment during the quarter and is classified with an intent to sell or inability or lack of intent to hold. During the current quarter, no securities that have recognized an other-than-temporary impairment fit this criteria.

3. There are no structured securities with recognized OTTI as of the reporting date.

4. Impaired securities for which an OTTI has not been recognized

A1. The aggregate amount of unrealized losses - Less than 12 months:	\$ 64,240
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$ 173,064
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$ 8,214,456
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$ 7,579,746

5. The general categories of information considered in reaching the conclusion that the impairments are not other-than temporary include:

- Probability of collecting all amounts due according to the contractual terms in effect at the time of acquisition.
- Intent to sell: Is there intent to sell the security before recovery.
- The length of time and the extent to which fair value has been less than amortized cost.
- The financial conditions and short term prospects of the issuer.
- Intent and Ability to hold: Is there a lack of ability to hold, where cash and working capital requirements and contractual or regulatory obligations indicate that the investment may need to be sold before the forecasted recovery occurs.

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

No significant change.

Note 7 - Investment Income

No significant change.

Note 8 - Derivative Instruments

No significant change.

Note 9 - Income Taxes

9A. 1. The Components of the net deferred tax asset/(liability) at the end of each period are as follows:

	9/30/2015			12/31/2014			CHANGE		
	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL
1a. Gross deferred tax assets	\$ 7,838,046	\$ 562,781	\$ 8,400,827	\$ 4,961,084	\$ 377,958	\$ 5,339,042	\$ 2,876,962	\$ 184,823	\$ 3,061,785
1b. Statutory valuation allowance adjustment	-	-	-	-	-	-	-	-	-
1c. Adjusted gross deferred tax assets (1a-1b)	\$ 7,838,046	\$ 562,781	\$ 8,400,827	\$ 4,961,084	\$ 377,958	\$ 5,339,042	\$ 2,876,962	\$ 184,823	\$ 3,061,785
1d. Deferred tax liabilities	250,933	197	251,130	179,790	197	179,987	71,143	-	71,143
1e. Subtotal (net deferred tax assets) (1c-1d)	\$ 7,587,113	\$ 562,584	\$ 8,149,697	\$ 4,781,294	\$ 377,761	\$ 5,159,055	\$ 2,805,819	\$ 184,823	\$ 2,990,642
1f. Deferred tax assets nonadmitted	24,763	393,723	418,486	29,923	120,057	149,980	(5,160)	273,666	268,506
1g. Net admitted deferred tax assets (1e-1f)	\$ 7,562,350	\$ 168,861	\$ 7,731,211	\$ 4,751,371	\$ 257,704	\$ 5,009,075	\$ 2,810,979	\$ (88,843)	\$ 2,722,136

NOTES TO FINANCIAL STATEMENTS

9A. 2. Admission calculation components - SSAP 101, paragraphs 11.a., 11.b., 11.c.

(a) Federal Income taxes Paid in Prior years Recoverable through Carry-backs	\$ -	\$ -	\$ -	\$ 1,416,432	\$ 257,704	\$ 1,674,136	\$ (1,416,432)	\$ (257,704)	\$ (1,674,136)
(b) Adjusted Gross Deferred Tax Assets Expected to be Realized after Application of Threshold Limitation	7,562,350	168,862	7,731,212	3,334,938	-	3,334,938	4,227,412	168,862	4,396,274
(1) Adjusted Gross Deferred Tax Assets Expected to be Realized	7,562,350	168,862	7,731,212	3,334,938	-	3,334,938	4,227,412	168,862	4,396,274
(2) Adjusted Gross Deferred Tax Assets Allowed per Limitation on Threshold	XXX	XXX	13,175,375	XXX	XXX	14,789,038	XXX	XXX	(1,613,663)
(c) Adjusted Gross Deferred Tax Assets offset by Gross Deferred Tax Liabilities	\$ 250,933	\$ 196	\$ 251,129	\$ 179,791	\$ 197	\$ 179,988	\$ 71,142	\$ (1)	\$ 71,141
(d) Deferred Tax Assets Admitted as the Result of Application of SSAP101 (Total 2(a) + 2(b) + 2(c))	\$ 7,813,283	\$ 169,058	\$ 7,982,341	\$ 4,931,161	\$ 257,901	\$ 5,189,062	\$ 2,882,122	\$ (88,843)	\$ 2,793,279

9A. 3. Realization Thresholds

	2015	2014
(a) Ratio Percentage Used to Determine Recovery Period & Threshold Limitation Amount	787%	919%
(b) Amount of Adjusted Capital & Surplus used to Determine Recovery Period and Threshold Limitation in 2(b)(2) above	87,835,837	98,593,587

9A. 4. Impact of Tax Planning Strategies

(a) Adjusted Gross DTA's (% of Total Adjusted Gross DTA's)	0.00%	30.00%	2.01%	0.00%	68.18%	4.83%	0.00%	-38.18%	-2.82%
(b) Net Admitted Adjusted Gross DTA's (% of Total Net Admitted Adjusted Gross DTA's)	0.00%	100.00%	2.18%	0.00%	100.00%	5.14%	0.00%	0.00%	-2.96%

The Company's tax planning strategies did not include the use of reinsurance-related tax planning strategies.

9B. There were no unrecognized deferred tax liabilities.

9C. 1. Current Income Tax

	9/30/2015	12/31/2014	CHANGE
(a) Federal	\$ (2,807,172)	\$ 66,823	\$ (2,873,995)
(b) Foreign	-	-	-
(c) Subtotal	\$ (2,807,172)	\$ 66,823	\$ (2,873,995)
(d) Federal income tax on net capital gains	390,915	1,126,871	(735,956)
(e) Utilization of capital loss carry-forwards	-	-	-
(f) Other	-	-	-
(g) Federal and foreign income taxes incurred	\$ (2,416,257)	\$ 1,193,694	\$ (3,609,951)

9C. 2. Deferred Tax Assets

(a) Ordinary

	9/30/2015	12/31/2014	CHANGE
(1) Discounting of Unpaid Losses	\$ 986,599	\$ 1,105,525	\$ (118,926)
(2) Unearned premium reserve	2,148,797	1,694,216	454,581
(3) Policyholder reserve	-	-	-
(4) Investments	-	-	-
(5) Deferred acquisition costs	-	-	-
(6) Policyholder dividends accrual	-	-	-
(7) Fixed Assets	140,188	102,004	38,184
(8) Compensation and benefits accrual	-	-	-
(9) Pension accrual	-	-	-
(10) Receivables - nonadmitted	70,000	70,000	-
(11) Net operating loss carry-forward	1,301,300	-	1,301,300
(12) Tax Credit carry-forward	1,345,939	644,808	701,131
(13) Other	978,293	604,913	373,380
(14) Other assets - nonadmitted	866,929	739,618	127,311
(99) Subtotal	\$ 7,838,045	\$ 4,961,084	\$ 2,876,961

(b) Statutory valuation allowance adjustment

	-	-	-
(c) Nonadmitted	24,763	29,923	(5,160)
(d) Admitted ordinary deferred tax assets (2a99-2b-2c)	\$ 7,813,282	\$ 4,931,161	\$ 2,882,121

(e) Capital

(1) Investments	562,781	377,958	184,823
(2) Net capital loss carryforward	-	-	-
(3) Real estate	-	-	-
(4) Other	-	-	-
(99) Subtotal	\$ 562,781	\$ 377,958	\$ 184,823

(f) Statutory valuation allowance adjustment

	-	-	-
(g) Nonadmitted	393,723	120,057	273,666
(h) Admitted capital deferred tax assets (2E99-2F-2g)	\$ 169,058	\$ 257,901	\$ (88,843)
(i) Admitted deferred tax assets (2d+2h)	\$ 7,982,340	\$ 5,189,062	\$ 2,793,278

3. Deferred Tax Liabilities

(a) Ordinary

	9/30/2015	12/31/2014	CHANGE
(1) Investments	75,016	76,487	(1,471)
(2) Fixed Assets	-	-	-
(3) Deferred and uncollected premium	-	-	-
(4) Policyholder reserves	-	-	-
(5) Other	175,917	103,303	72,614
(99) Subtotal	\$ 250,933	\$ 179,790	\$ 71,143

(b) Capital

(1) Investments	197	197	-
(2) Real estate	-	-	-
(3) Other	-	-	-
(99) Subtotal	\$ 197	\$ 197	\$ -

NOTES TO FINANCIAL STATEMENTS

(c) Deferred tax liabilities (3a99+3b99)	\$ 251,130	\$ 179,987	\$ 71,143
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4. Net deferred tax assets/liabilities (2i-3c)	\$ 7,731,210	\$ 5,009,075	\$ 2,722,135
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9D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

The significant items causing a difference between the statutory federal income tax rate and the Company's effective income tax rate are as follows:

	9/30/2015	Effective Tax Rate
Provision computed at statutory rate	\$ (3,675,268)	35.0%
Tax preferred investment	(186,028)	1.8%
Nondeductible expenses	5,414	-0.1%
Tax on change in non-admitted assets	(93,903)	0.9%
Tax on other surplus adjustments	(1,270,801)	12.1%
True-ups and other adjustments to tax	16	0.0%
Total tax	\$ (5,220,570)	49.7%
Reconciliation		
Federal and foreign income taxes incurred	(2,807,172)	26.7%
Realized capital gains (losses) tax	390,915	-3.7%
Change in deferred tax	(2,804,313)	26.7%
Total tax	\$ (5,220,570)	49.7%

9E. Operating Loss and Tax Credit Carryforwards

(1) As of 9/30/2015, the Company had \$3,718,000 of net operating losses available to offset future taxable income and \$0 in capital losses available to offset future capital gain income. The Company had \$1,345,939 in Alternative Minimum Tax (AMT) credits available.

Net Operating losses were generated and expire as follows:

Year Generated	Amount	Year of Expiration
2015	\$ 3,718,000	2035
	<u>\$ 3,718,000</u>	

AMT credits never expire. The Company's remaining credits were generated as follows:

Year Generated	Carryover Remaining
2009	\$ 71,936
2010	560,056
2012	149,258
2013	348,541
2014	216,148
	<u>\$ 1,345,939</u>

(2) The Company does not have any income tax expense that is available for recoupment in the event of future net losses.

(3) The Company did not have any protective tax deposits under Section 6603 of the Internal Revenue Code

9F. Consolidated Federal Income Tax Return

(1) For the period ending December 31, 2015, The Company will file as a part of the consolidated federal income tax return with its ultimate U.S. parent, Mapfre USA Corp and its subsidiaries, The Commerce Insurance Company, Citation Insurance Company, Commerce West Insurance Company, MAPFRE Insurance Company of New York, MAPFRE Insurance Company of Florida, MAPFRE Insurance Company, CUBE Insurance Company, ACIC Holding Company, Inc., Bay Finance Holding Company, and Mapfre Intermediaries, Inc. (said parties constituting an "Affiliated Group," as defined in and for the purposes of IRC §1504(a))

(2) Each affiliate is jointly and severally liable for federal income taxes of the Affiliated Group, and has entered into a written tax sharing agreement. Under this agreement, allocation is made primarily on a separate return basis, with current payment for losses and other tax items utilized in the consolidated return.

9G. Federal or foreign Federal Income Tax Loss Contingencies

The Company has no tax loss contingencies for which it is reasonably possible that the total liability will significantly increase within twelve months of the reporting date.

Note 10 - Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

No significant change.

Note 11 - Debt

No significant change.

Note 12 - Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans

No significant change.

Note 13 - Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

No significant change.

Note 14 - Contingencies

No significant change.

Note 15 - Leases

No significant change.

NOTES TO FINANCIAL STATEMENTS**Note 16 - Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk**

No significant change.

Note 17 - Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

C. No wash sales to report this quarter.

Note 18 - Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans

No significant change.

Note 19 - Direct Premium Written/Produced by Managing General Agents/Third Party Administrators

No significant change.

Note 20 - Fair Value Measurements**A1 Summary of Financial Assets Measured and Reported at Fair Value at 09/30/15**

Description	Level 1	Level 2	Level 3	TOTAL
Bonds	\$ -	\$ 1,993,838	\$ -	\$ 1,993,838
Preferred Stock	-	1,474,300	-	1,474,300
Common Stock	-	-	-	-
TOTALS	\$ -	\$ 3,468,138	\$ -	\$ 3,468,138

A2 Fair Value Measurement in Level 3 of the Fair Value Hierarchy.

Description	Beginning Balance at 7/1/2015	Transfers into Level 3	Transfers out of Level 3	Total gains & (losses) included in Net Income	Total gains and (losses) included in Surplus	Purchases	Issuances	Sales	Settlements	Ending Balance at 9/30/2015
Bonds	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Preferred Stock	-	-	-	-	-	-	-	-	-	-
Common Stock	-	-	-	-	-	-	-	-	-	-
TOTALS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

A3 The company's policy is to recognize "transfers into" and "transfers out of" the Fair Value Hierarchy Levels on the actual date of the event or change in circumstances that caused the transfer.

A4 Financial Assets included in Level 1 of the Fair Value Hierarchy include US Treasury securities and exchange traded common stock where prices are obtained directly from active markets.

Financial Assets included in Level 2 of the Fair Value Hierarchy are securities priced by the company's custodial bank and based on observable market data.

Financial Assets included in Level 3 of the Fair Value Hierarchy are securities priced utilizing broker quotes.

A5 The company does not hold derivative assets or liabilities.

20C Aggregate Fair Value of all Financial Instruments by Hierarchical Level

Type of Financial Instrument	Aggregate Fair Value	Admitted Asset	Level 1	Level 2	Level 3	Not Practicable
Bonds	\$ 137,215,450	\$ 135,469,606	\$ 6,005,005	\$ 131,210,445	\$ -	\$ -
Preferred Stock	1,474,300	1,474,300	-	1,474,300	-	-
Common Stock	-	-	-	-	-	-
TOTALS	\$ 138,689,750	\$ 136,943,906	\$ 6,005,005	\$ 132,684,745	\$ -	\$ -

20D Not Practicable to Estimate Fair Value

NONE

Note 21 - Other Items

No significant change.

Note 22 - Events Subsequent

No significant change.

Note 23 - Reinsurance

No significant change.

Note 24 - Retrospectively Rated Contracts & Contracts Subject to Redetermination

No significant change.

Note 25 - Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$120,798,000 were higher by \$1,181,000 due to unfavorable development of prior year estimates. This deficiency was 1.4% of the unpaid losses and LAE of \$82,859,000 as of prior year-end.

NOTES TO FINANCIAL STATEMENTS**Note 26 - Intercompany Pooling Arrangements**

Effective January 1, 2015, the pooling agreement was expanded to include affiliate company Cube Insurance Company. The revised percentages are as follows:

<u>COMPANY</u>	<u>POOLING PERCENTAGES</u>	
	<u>2015</u>	<u>2014</u>
The Commerce Insurance Company	65.1%	71.2%
Citation Insurance Company	8.1%	7.4%
American Commerce Insurance Company	9.8%	9.1%
Commerce West Insurance Company	5.4%	4.6%
MAPFRE Insurance Company of New York	5.0%	3.9%
MAPFRE Insurance Company of Florida	3.4%	2.1%
MAPFRE Insurance Company	2.4%	1.7%
Cube Insurance Company	0.8%	0.0%
	<u>100.0%</u>	<u>100.0%</u>

Note 27 - Structured Settlements

No significant change.

Note 28 - Health Care Receivables

No significant change.

Note 29 - Participating Policies

No significant change.

Note 30 - Premium Deficiency Reserves

No significant change.

Note 31 - High Deductibles

No significant change.

Note 32 - Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

No significant change.

Note 33 - Asbestos/Environmental Reserves

No significant change.

Note 34 - Subscriber Savings Accounts

No significant change.

Note 35 - Multiple Peril Crop Insurance

No significant change.

Note 36 - Financial Guaranty Insurance

B. No significant change.

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

- 1.1 Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act? Yes [] No [X]
- 1.2 If yes, has the report been filed with the domiciliary state? Yes [] No []
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes [] No [X]
- 2.2 If yes, date of change: _____

- 3.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? If yes, complete Schedule Y, Parts 1 and 1A. Yes [X] No []
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes [] No [X]
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.

- 4.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes [] No [X]
- 4.2 If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

1 Name of Entity	2 NAIC Company Code	3 State of Domicile
	0	

- 5. If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved? If yes, attach an explanation. Yes [] No [X] N/A []

- 6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2013
- 6.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. 12/31/2013
- 6.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). 06/19/2015

6.4 By what department or departments?
State of Ohio Department of Insurance

- 6.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with the Department? Yes [] No [] N/A [X]
- 6.6 Have all of the recommendations within the latest financial examination report been complied with? Yes [] No [] N/A [X]
- 7.1 Has this reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes [] No [X]
- 7.2 If yes, give full information:

- 8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes [] No [X]
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.

- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes [] No [X]
- 8.4 If the response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator].

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 FDIC	6 SEC

- 9.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? Yes [X] No []
 - (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
 - (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
 - (c) Compliance with applicable governmental laws, rules and regulations;
 - (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
 - (e) Accountability for adherence to the code.

- 9.11 If the response to 9.1 is No, please explain:
- 9.2 Has the code of ethics for senior managers been amended? Yes [X] No []
- 9.21 If the response to 9.2 is Yes, provide information related to amendment(s).

Minor changes to align with Code of Good Governance and more closely resemble that of our Spanish parent.

- 9.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [] No [X]
 9.31 If the response to 9.3 is Yes, provide the nature of any waiver(s).

FINANCIAL

- 10.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [] No [X]
 10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 0

INVESTMENT

- 11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) Yes [] No [X]
 11.2 If yes, give full and complete information relating thereto:

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: \$ 0
 13. Amount of real estate and mortgages held in short-term investments: \$ 0

- 14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? Yes [] No [X]

14.2 If yes, please complete the following:

	1 Prior Year-End Book/Adjusted Carrying Value	2 Current Quarter Book/Adjusted Carrying Value
14.21 Bonds	\$ 0	\$ 0
14.22 Preferred Stock	0	0
14.23 Common Stock	0	0
14.24 Short-Term Investments	0	0
14.25 Mortgage Loans on Real Estate	0	0
14.26 All Other	0	0
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	\$ 0	\$ 0
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above	\$ 0	\$ 0

- 15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? Yes [] No [X]
 15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No []
 If no, attach a description with this statement.

16. For the reporting entity's security lending program, state the amount of the following as of current statement date:

- 16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
 16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
 16.3 Total payable for securities lending reported on the liability page: \$ 0

17. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes [X] No []

17.1 For all agreements that comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, complete the following:

1 Name of Custodian(s)	2 Custodian Address
Bank of New York Mellon	One Wall Street, New York, NY

17.2 For all agreements that do not comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, provide the name, location and a complete explanation

1 Name(s)	2 Location(s)	3 Complete Explanation(s)

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]

17.4 If yes, give full and complete information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason

17.5 Identify all investment advisors, broker/dealers or individuals acting on behalf of broker/dealers that have access to the investment accounts, handle securities and have authority to make investments on behalf of the reporting entity:

1 Central Registration Depository	2 Name(s)	3 Address

- 18.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Securities Valuation Office* been followed? Yes [X] No []

18.2 If no, list exceptions:

GENERAL INTERROGATORIES (continued)

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

1. If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change? Yes No N/A
 If yes, attach an explanation.

Effective January 1, 2015, the pooling agreement was expanded to include affiliate Company, Cube Insurance Company. The revised pooling percentages can be found in note 26 of this statement.

2. Has the reporting entity reinsured any risk with any other reporting entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on the risk, or portion thereof, reinsured? Yes No
 If yes, attach an explanation.

- 3.1 Have any of the reporting entity's primary reinsurance contracts been canceled? Yes No
 3.2 If yes, give full and complete information thereto:

- 4.1 Are any of the liabilities for unpaid losses and loss adjustment expenses other than certain workers' compensation tabular reserves (see *Annual Statement Instructions* pertaining to disclosure of discounting for definition of "tabular reserves.") discounted at a rate of interest greater than zero? Yes No
 4.2 If yes, complete the following schedule:

1 Line of Business	2 Maximum Interest	3 Disc. Rate	Total Discount				Discount Taken During Period			
			4 Unpaid Losses	5 Unpaid LAE	6 IBNR	7 Total	8 Unpaid Losses	9 Unpaid LAE	10 IBNR	11 Total
	0.000	0.000	0	0	0	0	0	0	0	0
Total	XXX	XXX	0	0	0	0	0	0	0	0

- 5.1 Operating Percentages:
- | | |
|---|--------|
| 5.1 A&H loss percent | 0.000% |
| 5.2 A&H cost containment percent | 0.000% |
| 5.3 A&H expense percent excluding cost containment expenses | 0.000% |
- 6.1 Do you act as a custodian for health savings accounts? Yes No
 6.2 If yes, please provide the amount of custodial funds held as of the reporting date. \$ 0
 6.3 Do you act as an administrator for health savings accounts? Yes No
 6.4 If yes, please provide the amount of funds administered as of the reporting date. \$ 0

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

1 NAIC Company Code	2 ID Number	3 Name of Reinsurer	4 Domiciliary Jurisdiction	5 Type of Reinsurer	6 Certified Reinsurer Rating (1 through 6)	7 Effective Date of Certified Reinsurer Rating
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NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.	1 Active Status	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid	
		2 Current Year to Date	3 Prior Year to Date	4 Current Year to Date	5 Prior Year to Date	6 Current Year to Date	7 Prior Year to Date
1. Alabama.....AL.....L.....		323,369	300,721	35,372	8,037	10,597	57,966
2. Alaska.....AK.....L.....		70,001	3,258	8,079		11,571	1,902
3. Arizona.....AZ.....L.....		4,251,691	4,595,210	2,167,378	4,099,844	2,345,717	1,617,803
4. Arkansas.....AR.....L.....		228,620	126,066	12,250	5,232	37,004	17,625
5. California.....CA.....L.....		1,168,855	47,769	85,525	1,229	271,809	21,902
6. Colorado.....CO.....L.....		199,806	89,030	25,453	4,610	136,909	38,935
7. Connecticut.....CT.....L.....		87,961,606	34,701,806	25,883,426	15,568,828	30,665,062	17,039,113
8. Delaware.....DE.....L.....		169,225	55,149	28,692	65,648	1,159,724	1,242,557
9. District of Columbia.....DC.....L.....		38,770	18,038	2,716	1,562	16,167	13,362
10. Florida.....FL.....L.....		1,429,086	774,667	204,235	191,505	245,676	152,136
11. Georgia.....GA.....L.....		555,935	325,836	293,831	17,351	129,339	42,587
12. Hawaii.....HI.....L.....		29,249	16,933	491	1,923	7,664	678
13. Idaho.....ID.....L.....		2,778,031	2,548,506	1,912,153	1,440,182	1,644,019	937,043
14. Illinois.....IL.....L.....		1,394,496	1,256,130	134,520	430,530	162,405	392,239
15. Indiana.....IN.....L.....		3,758,064	4,899,760	3,625,164	4,491,363	2,782,777	3,418,405
16. Iowa.....IA.....L.....		126,446	98,619	28,461	5,935	14,211	8,244
17. Kansas.....KS.....L.....		261,698	108,162	353,379	15,659	40,446	9,008
18. Kentucky.....KY.....L.....		4,457,717	4,477,775	2,624,220	2,319,974	2,088,184	2,266,720
19. Louisiana.....LA.....L.....		402,563	349,545	30,521	243,916	159,157	197,110
20. Maine.....ME.....L.....		123,288	30,975	9,091	121	2,966	2,032
21. Maryland.....MD.....L.....		286,630	177,257	120,636	83,950	89,858	145,486
22. Massachusetts.....MA.....L.....		195,423	144,433		1,900	13,648	17,168
23. Michigan.....MI.....L.....		551,333	426,159	134,019	12,900	115,759	44,575
24. Minnesota.....MN.....L.....		442,727	314,752	8,913	(131)	56,943	26,509
25. Mississippi.....MS.....L.....		94,927	76,041	20,070	(1,251)	8,135	2,657
26. Missouri.....MO.....L.....		283,487	138,470	11,683	3,938	39,440	11,284
27. Montana.....MT.....L.....		76,828	20,072	5,936	3,484	17,708	11,334
28. Nebraska.....NE.....L.....		254,131	285,139	136,465	23,338	86,063	19,059
29. Nevada.....NV.....L.....		151,188	38,592	384,994	315,080	33,057	403,074
30. New Hampshire.....NH.....L.....		178,620	137,861	57	6,458	7,025	22,045
31. New Jersey.....NJ.....L.....		59,204,661	64,605,750	44,780,235	40,667,462	41,769,839	38,027,460
32. New Mexico.....NM.....L.....		132,174	63,776	6,139	1,612	17,562	4,690
33. New York.....NY.....L.....		1,350,923	1,038,895	5,243,421	6,492,986	4,380,718	9,687,384
34. North Carolina.....NC.....L.....		822,780	616,550	159,004	356	163,744	53,011
35. North Dakota.....ND.....L.....		19,988	4,259			6,203	3,551
36. Ohio.....OH.....L.....		16,802,893	13,645,073	8,918,496	7,632,894	9,165,787	6,679,670
37. Oklahoma.....OK.....L.....		205,983	53,711	104,174	14,321	112,405	(10,953)
38. Oregon.....OR.....L.....		14,490,362	17,647,566	10,018,407	9,606,794	9,018,718	9,701,733
39. Pennsylvania.....PA.....L.....		1,121,977	877,127	81,114	63,645	2,060,396	1,958,881
40. Rhode Island.....RI.....L.....		35,280,820	29,812,913	21,595,819	18,026,220	22,923,757	20,074,752
41. South Carolina.....SC.....L.....		711,897	642,398	24,453	7,893	44,251	47,252
42. South Dakota.....SD.....L.....		17,874	7,388	5,374	1,302	70,355	61,075
43. Tennessee.....TN.....L.....		9,766,176	13,182,199	7,157,309	6,835,013	4,932,839	4,159,716
44. Texas.....TX.....L.....		1,284,167	671,961	181,342	150,391	272,416	137,445
45. Utah.....UT.....L.....		118,027	83,046	28,363	(8,639)	110,974	31,535
46. Vermont.....VT.....L.....		125,899	80,976	984		3,866	531
47. Virginia.....VA.....L.....		588,492	442,527	8,445	22,421	93,000	45,412
48. Washington.....WA.....L.....		21,140,867	24,877,593	14,675,120	16,617,388	13,936,921	15,607,455
49. West Virginia.....WV.....L.....		15,789	5,168	1,613	(80)	2,227	25,537
50. Wisconsin.....WI.....L.....		397,777	241,291	7,453	37,114	49,004	73,830
51. Wyoming.....WY.....L.....		19,357	9,642	8,699		7,107	7,376
52. American Samoa.....AS.....N.....							
53. Guam.....GU.....N.....							
54. Puerto Rico.....PR.....N.....							
55. US Virgin Islands.....VI.....N.....							
56. Northern Mariana Islands.....MP.....N.....							
57. Canada.....CAN.....N.....							
58. Aggregate Other Alien.....OT.....XXX.....		0	0	0	0	0	0
59. Totals.....(a).....51.....		275,862,693	225,192,540	151,293,694	135,532,208	151,541,129	134,557,901

DETAILS OF WRITE-INS

58001.....	XXX.....						
58002.....	XXX.....						
58003.....	XXX.....						
58998. Summary of remaining write-ins for Line 58 from overflow page....	XXX.....	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	XXX.....	0	0	0	0	0	0

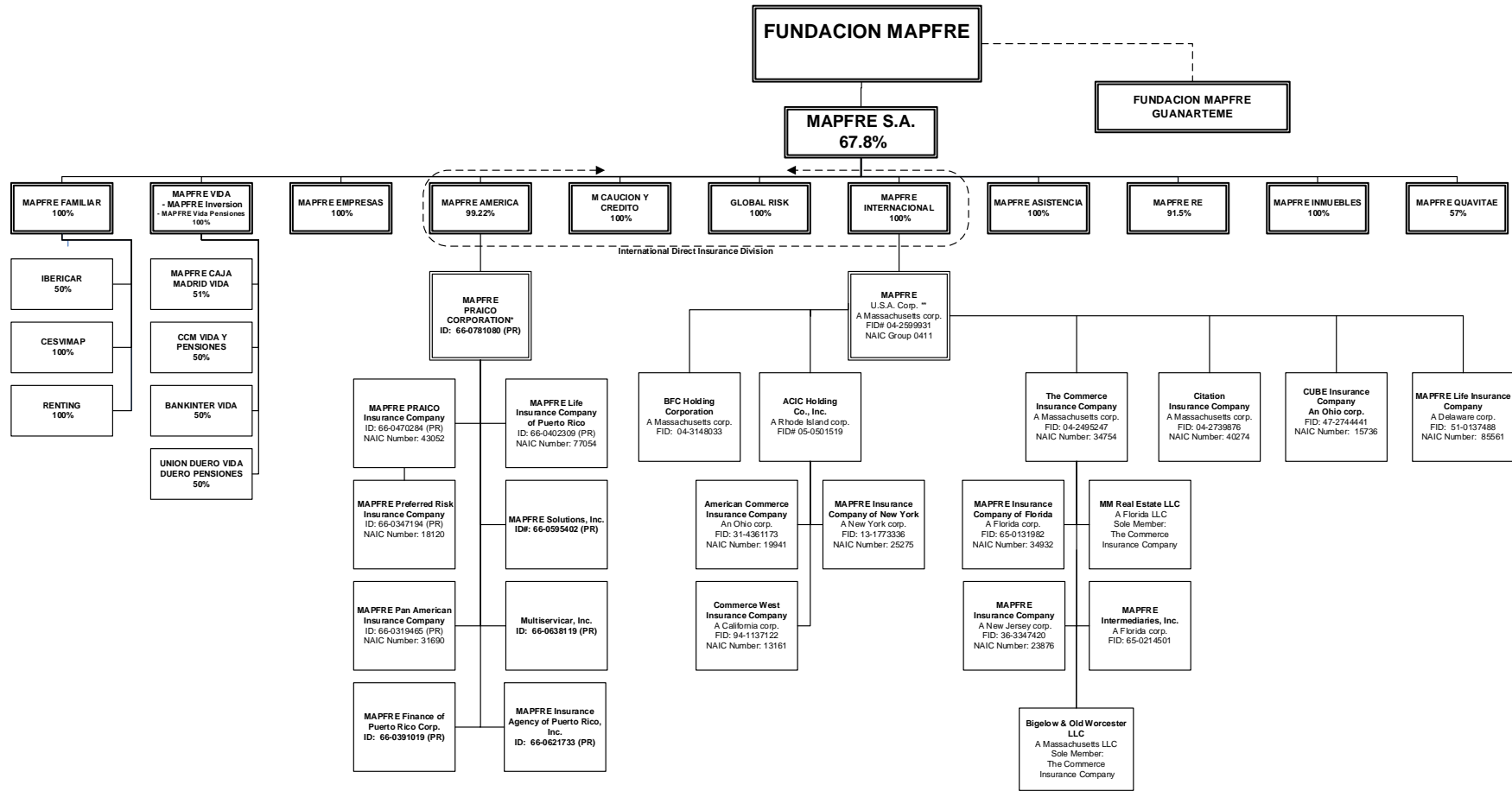
(L) - Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) - Registered - Non-domiciled RRGs; (Q) - Qualified - Qualified or Accredited Reinsurer;

(E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) - None of the above - Not allowed to write business in the state.

(a) Insert the number of L responses except for Canada and Other Alien.

SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

PART 1 – ORGANIZATIONAL CHART



* All subsidiaries of MAPFRE PRAICO Corporation are 100% owned by their parent companies, except MAPFRE Preferred Risk Insurance Company which is 100% owned by MAPFRE PRAICO Insurance Company.

** All subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies, except ACIC Holding Co., Inc., which is 5% owned by AAA Southern New England and 0.06% owned by AAA Ohio Auto Club and AAA Oregon / Idaho each.

***See attached list for additional companies.

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	100.0		
POLICLINICO SALUD 4, S.A.	100.0		
MULTISERVICAR	100.0		
MAPFRE GESTION DE FLOTAS, S.A.	100.0		
CLUB MAPFRE, S.A.	100.0		
MAPFRE MULTICENTRO DEL AUTOMOVIL, S.A.	100.0		
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	100.0		
VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	100.0		
BUSINESS LAB VENTURES, S.A.	100.0		
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5		
MAPFRE TECH	78.5		
MAPFRE VIDEO Y COMUNICACION, S.A.	50.0		
DISEÑO URBANO, S.L.	50.0		
SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.	50.0		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
FINLOG-ALUGUER E COMERCIO DE AUTOMOVEIS, S.A.	50.0		
CATALUNYA CAIXA ASSEGURANCES GENERALS	50.0		
IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	50.0		
AUTOMOCION PENINSULAR INMUEBLES, S.A.	50.0		
ONLINE SHOPPING CLUB EUROPE, S.L.	49.9		
BANKINTER SEGUROS GENERALES, S.A.	25.1		
RESTREATOR.COM LTD	25.0		
ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	22.5		
AUDATEX ESPANA, S.A.	12.5		
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0		
TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	16.4		
FUNESPANA, S.A.	63.8		
FUNERARIA PEDROLA, S.L.	100.0		
FUNEBALEAR, S.L.	100.0		
FUENMALAGA, S.L.	100.0		
SERVICIOS EMPRESAS MORTUORIAS PONTEVEDRESAS, S.A.	100.0		
KEGYELET TEMETKEZESI SZOLGALAT	100.0		
TANATORIUM ZRT	100.0		
ALL FUNERAL SERVICES, S.L.	100.0		
FUNERARIA CRESPO, S.L.	100.0		
TANATORIO SAN ALBERTO, S.A.	100.0		
FUNEGRUP, S.L.	100.0		
SALZILLO SERVICIOS FUNERARIOS S.L.	76.0		
SERVICIOS Y GESTION FUNERARIA, S.A.	100.0		
SERVICIOS FUNERARIOS EL CARMEN, S.A.	100.0		
FUNERARIA GIMENO, S.A.	100.0		
FUNERARIA SANTO ROSTRO, S.A.	100.0		
TANATORI ALACANT, S.A.	100.0		
TANATORI BENIDORM, S.L.	100.0		
TANATORIO DE ARANJUEZ, S.L.	100.0		
TANATORI LA DAMA D'ELX, S.L.	97.1		
ZACARIAS NUNO, S.L.	50.0		
FUNERARIA TERRASA, S.A.	100.0		
SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.	65.2		
CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	49.0		
FUNETXEA, S.L.	100.0		
FUNERARIA SARRIA, S.A.	100.0		
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.0		
FUNERARIA ZETA ORBITAL, S.L.	100.0		
FUNERARIA VALLE DEL EBRO, S.L.	100.0		
INICIATIVAS ALCAESAR, S.L.	64.9		
ALCAESAR FUNERHERVAS, S.L.	100.0		
ALCAESAR FUNERCORIA, S.L.	100.0		
FUNERTRUJILLO, S.L.	100.0		
SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.	30.0		
ALCAESAR FUNERPLASENCIA, S.L.	50.0		
NUEVO TANATORIO, S.L.	50.0		
NUEVOS SERVICIOS FUNERARIOS, S.L.	50.0		
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.0		
TANATORIO Y CEMENTERIO DE SANLUCAR, S.L.	75.0		
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.0		
GESTION DE CEMENTERIS DE TARRAGONA	50.0		
GAB MANAGEMENT & CONSULTING, S.R.L.	77.6		
POMPAS FUNEBRES DOMINGO, S.L.	75.0		
DE MENA SERVICIOS FUNERARIOS S.L.	70.0		
CEMENTERIO PARQUE ANDUJAR, S.L.	60.0		
FUNBIERZO, S.L.	67.5		
FUNERARIA HISPALENSE, S.L.	50.0		
ISABELO ALVAREZ MAYORGA, S.A.	50.0		
SERVICIOS FUNERARIOS DEL NERVION, S.L.	50.0		
EMPRESA MIXTA SERVICIOS FUNERARIOS DE MADRID, S.A.	49.0		
TANATORIO DE ECJJA, S.L.	25.0		
TANATORIO SE-30 SEVILLA, S.L.	10.0		
HIJOS DE LUIS SANTOS, S.L.	100.0		
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	66.0		
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	34.0		
MAPFRE INMUEBLES, S.G.A.	50.2		
INMOBILIARIA MAPINVER S.A.	100.0		
DESARROLLOS URBANOS CIC, S.A.	99.9		
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9		
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.4		
BIOINGENIERIA ARAGONESA, S.L.	40.0		
MAPFRE SEGUROS GERAIS S.A.	100.0		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.9		
MAPFRE TECH	14.7		
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0		
MIRACETI S.A.	100.0		
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	100.0		
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	100.0		
MAPFRE INVERSION DOS SOCIEDAD GESTORA DE INSTITUCIONES DE INVERSION COLECTIVA S.A.	100.0		
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.9		
GESTION MODA SHOPPING S.A.	99.8		
MAPFRE CAJA MADRID VIDA, S.A.	51.0		
CATALUNYACAIXA VIDA S.A. D'ASSEGURANCES I	50.0		
BANKINTER SEGUROS DE VIDA, S.A.	50.0		
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.0		
UNION DEL DUERO COMPAÑIA DE SEGUROS DE VIDA, S.A.	50.0		
DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	50.0		
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3		
MAPFRE RE COMPAÑIA DE REASEGUROS, S.A.	91.5		
INVERSIONES IBERICAS, L.T.D.A.	100.0		
ITSEMAP CHILE, S.A.	25.0		
CIAR INVESTMENT	100.0		

INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.0	
REINSURANCE MANAGEMENT INC.	100.0	
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.	100.0	
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	100.0	
MAPFRE CHILE REASEGUROS, S.A.	100.0	
C R ARGENTINA, S.A.	100.0	
CAJA REASEGURADORA DE CHILE, S.A.	99.8	
INMOBILIARIA TIRILLUCA S.A.	43.8	
INMOBILIARIA COSTA DE MONTEMAR, S.A.	31.4	
ADMINISTRADORA DE PROPIEDADES S.A.	31.3	
COMMERCIAL Y TURISMO, S.A.	31.2	
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.0	
ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	40.0	
MAPFRE AMERICA, S.A.	99.2	
MAPFRE ARGENTINA HOLDING	100.0	
CLUB MAPFRE ARGENTINA	96.1	
MAPFRE ARGENTINA SEGUROS S.A.	100.0	
CESVI ARGENTINA, S.A.	65.0	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0	
MAPFRE PRAICO CORPORATION	100.0	66-0781080
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0	31690 66-0319465
MAPFRE FINANCE OF PUERTO RICO CORP	100.0	66-0391019
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0	66-0621733
MAPFRE SOLUTIONS, INC.	100.0	66-0595402
MULTISERVICAR INC.	100.0	66-0638119
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0	77054 66-0402309
MAPFRE PRAICO INSURANCE COMPANY	100.0	43052 66-0470284
MAPFRE PREFERRED RISK INSURANCE COMPANY	100.0	18120 66-0347194
MAPFRE LA SEGURIDAD S.A.	99.5	
CLUB MAPFRE S.A.	100.0	
CEFOPROSEG C.A.	100.0	
INVERSORA SEGURIDAD C.A.	100.0	
AUTOMOTRIZ MULTISERVICAR, C.A.	99.7	
MAPFRE CHILE SEGUROS S.A.	100.0	
EUROAMERICA ASESORIAS GENERALES S.A.	100.0	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	18.6	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	81.4	
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	100.0	
MAPFRE CHILE VIDA S.A.	100.0	
INVERSIONES MAPFRE CHILE LIMITADA	100.0	
MAPFRE HOLDING DO BRASIL LTDA	98.8	
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.0	
DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA	100.0	
PROTENSEG CORRETORA DE SEGUROS LTDA	90.0	
CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	100.0	
MAPFRE SAUDE LTDA	100.0	
MAPFRE BRASIL PARTICIPACOES, S.A.	91.7	
MAPFRE PREVIDENCIA S.A.	100.0	
MAPFRE SEGURODORA DE CREDITO A LA EXPORTACION, S.A.	100.0	
MAPFRE CAPITALIZACAO	100.0	
MAPFRE BB SH2 PARTICIPACOES, S.A.	50.0	
ALIANCA DO BRASIL SEGUROS S.A.	100.0	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0	
MAPFRE SEGUROS GERAIS S.A.	100.0	
MAPFRE AFFINITY SEGURODORA	100.0	
MAPFRE ASSISTENCIA	100.0	
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0	
MAPFRE VIDA S.A.	100.0	
VIDA SEGURODORA	100.0	
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.0	
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	100.0	
MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	100.0	
MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	100.0	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	94.3	
CREDIMAPFRE	94.9	
AUTOMOTORES CAPITAL LTDA	100.0	
MAPFRE SERVICIOS EXEQUIALES SAS	100.0	
MAPFRE COLOMBIA VIDA S.A.	94.4	
GESTIMAP S.A.	92.3	
CESVI COLOMBIA, S.A.	63.9	
MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	67.3	
CORPORACION FINISTERRE, S.A.	100.0	
MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	99.3	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.6	
MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	60.0	
MAPFRE SOFT S.A.	100.0	
MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	89.5	
APOINT S.A.	100.0	
MAPFRE LA URUGUAYA S.A.	100.0	
MAPFRE DOMINICANA S.A.	100.0	
MAPFRE BHD COMPANIA DE SEGUROS, S.A.	51.0	
CREDI PRIMAS, S.A.	100.0	
GRUPO CORPORATIVO LML S.A. DE C.V.	100.0	
MAPFRE TEPEYAC S.A.	44.3	
MAPFRE TEPEYAC S.A.	55.7	
UNIDAD MOVIL DE DIAGNOSTICO S.A.	100.0	
TEPEYAC INC.	100.0	
MAPFRE SERVICIOS MEXICANOS	100.0	
MAPFRE FIANZAS S.A.	100.0	
ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	78.8	
TEPEYAC ASESORES	51.0	
TEPEYAC ASESORES	16.0	
CESVI MEXICO, S.A.	14.0	
MAPFRE AMERICA CENTRAL, S.A.	100.0	
MAPFRE PANAMA	99.3	
INMOBILIARIA AMERICANA S.A.	78.9	
MPF TENEDORA AC, S.A.	100.0	
MAPFRE HONDURAS	73.0	
MAPFRE HONDURAS	25.1	
MAPFRE COSTA RICA	100.0	
MAPFRE GUATEMALA	100.0	
MAPFRE NICARAGUA	100.0	
AMA/ASISTENCIA MEDICA ADMISTRADA	99.7	
MAPFRE INTERNACIONAL S.A.	100.0	
MAPFRE USA CORPORATION INC.	100.0	04-2599931
MAPFRE LIFE INSURANCE COMPANY	100.0	85561 51-0137488
CUBE INSURANCE COMPANY	100.0	15736 47-2744441
THE CITATION INSURANCE COMPANY	100.0	40274 04-2739876
BAY FINANCE HOLDING COMPANY	100.0	04-3148033

INSPOP USA, LLC	10.0	
THE COMMERCE INSURANCE COMPANY	100.0	34754 04-2495247
MAPFRE INTERMEDIARIES	100.0	65-0214501
MAPFRE INSURANCE COMPANY OF FLORIDA	100.0	34932 65-0131982
MAPFRE INSURANCE COMPANY	100.0	23876 36-3347420
MM REAL ESTATE, LLC	100.0	
BIGELOW & OLD WORCESTER, LLC	100.0	04-2495247
ACIC HOLDINGS COMPANY, INC.	95.0	05-0501519
THE COMMERCE WEST INSURANCE COMPANY	100.0	13161 94-1137122
AMERICAN COMMERCE INSURANCE COMPANY	100.0	19941 31-4361173
MAPFRE INSURANCE COMPANY OF NEW YORK	100.0	25275 13-1773336
TURKIYE GENEL SIGORTA, A.S.	99.7	
GENEL YASAM SIFORTA, A.S.	100.0	
GENEL SERVISYEDEK PARCA DAGITIM TICARET ANONIM SIRKET	51.0	
MAPFRE INSULAR INSURANCE CORPORATION	74.9	
MIDDLESEA INSURANCE P.L.C.	54.6	
M.S.V. LIFE P.L.C.	50.0	
GROWTH INVESTMENTS LIMITED	100.0	
BEE INSURANCE MANAGEMENT LTD	100.0	
MIDDLESEA ASSIST LIMITED	49.0	
PT ASURANSI BINA DANA ARTA TBK	20.0	
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.0	
IBEROASISTENCIA, ARGENTINA S.A.	100.0	
VENEASISTENCIA, S.A.	100.0	
IRELAND ASSIST, LTD	100.0	
MEXICO ASISTENCIA, S.A.	100.0	
FEDERAL ASSIST CO.	100.0	
C.I. DE SERVICIOS Y ASIST.	100.0	
ALLMAP ASSIST	100.0	
ARABA ASSIST	100.0	
LLC M. WARRANTY	100.0	
MAPFRE ASISTENCIA LIMITED	100.0	
MAPFRE ASISTENCIA COMPANY LIMITED	100.0	
MAPFRE WARRANTY JAPAN	100.0	
INSURE AND GO USA	100.0	
COSTA RICA ASISTENCIA	100.0	
QUETZAL ASISTENCIA, S.A.	100.0	
NICASSIT, S.A.	100.0	
EL SALVADOR ASISTENCIA, S.A.	100.0	
NORASIST, INC D/B/A ROAD CANADA	100.0	
BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	100.0	
VIAJES MAPFRE CCI, S.L.	100.0	
INSURE AND GO AUSTRALIA	100.0	
BRASIL ASISTENCIA S/A	100.0	
MAPFRE ABRAXAS SOFTWARE, LTD	100.0	
MAPFRE WARRANTY UK LIMITED	100.0	
MAPFRE WARRANTY S.P.A.	100.0	
MAPFRE WARRANTIES	100.0	
FRANCE ASSIST	100.0	
ALLIANCE OPTIMALE, S.L.R.	100.0	
MAPFRE ASSISTANCE USA INC.	100.0	
CENTURY AUTOMOTIVE SERVICES COMPANY	100.0	
INSURE AND GO	100.0	
TRAVEL CLAIMS SERVICES LIMITED	100.0	
INSURE AND GO AUSTRALASIA	100.0	
CIG SERVICES LIMITED	100.0	
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	94.9	
ECUASISTENCIA	94.5	
PERU ASISTENCIA, S.A.	99.9	
CONSULTING DE SERVICIOS Y TECNOLOGIA SIAM, S.A.	99.9	
IBEROASISTENCIA INTERNACIONAL	99.8	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6	
EUROSOS	99.5	
URUGUAY ASISTENCIA	94.8	
SUR ASISTENCIA, S.A.	99.0	
NILE ASSIT	98.0	
TUR ASSIST	91.7	
ROAD CHINA ASSISTANCE CO., LTD.	60.3	
IBEROASISTENCIA, S.A.	99.9	
MIDDLESEA ASSIST LIMITED	51.0	
ASISTENCIA BOLIVIANA	99.5	
GULF ASSIST, B.S.C.	74.6	
CARIBE ASISTENCIA	73.7	
BENELUX ASSIST, S.A.	70.0	
PANAMA ASISTENCIA	58.0	
LIB ASSIST	51.0	
AFRIQUE ASSISTANCE, S.A.	49.0	
MAPFRE INMUEBLES, S.G.A.	10.0	
INMOBILIARIA MAPINVER S.A.	100.0	
DESARROLLOS URBANOS CIC, S.A.	99.9	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9	
MAPFRE GLOBAL RISKS	100.0	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0	
SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	100.0	
INDUSTRIAL RE MUSINI S.A.	100.0	
MAPFRE SERVICIOS DE CAUCION S.A.	99.7	
SOLUNION SEGUROS DE CREDITO S.A.	50.0	
SOLUNION SERVICIOS DE CREDITO, S.L.U.	100.0	
SOLUNION SERVICIOS DE CREDITO ARGENTINA	95.0	
ACI HOLDING USA	100.0	
EULER HERMES SEGUROS CHILE	75.4	
SOLUNION CHILE SERVICIOS	99.3	
SOLUNION COLUMBIA SERVICIOS	98.3	
EULER HERMES SEGUROS MEJICO	100.0	
SOLUNION MEJICO SERVICIOS	100.0	
MAPFRE AMERICA CAUCION Y CREDITO	100.0	
MAPFRE GARANTIAS Y CREDITO CIA DE SEGUROS, S.A.	100.0	
MAPFRE SEGUROS DE CREDITO S.A.	100.0	
COMPANIA DE SEGUROS DE CREDITOS COMERCIALES, S.A.	94.9	
MAPFRE SEGUROS DE EMPRESAS	100.0	
MAPFRE INMUEBLES, S.G.A.	26.7	
INMOBILIARIA MAPINVER S.A.	100.0	
DESARROLLOS URBANOS CIC, S.A.	99.9	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9	
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0	
BANKINTER SEGUROS GENERALES, S.A.	25.0	
MAPFRE SERVICIOS MARITIMOS, COMISARIADO Y LIQUIDACION DE AVERIAS, S.A.	100.0	
SERVICIOS DE PERITACION MAPFRE S.A.	96.0	
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3	
AGROSEGURO, S.A.	20.1	

ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	60.0
ITSEMAP BRASIL, LTDA	100.0
ITSEMAP MEXICO, S.A.	100.0
ITSEMAP PORTUGAL, LTDA	100.0
ITSEMAP CHILE, S.A.	75.0
MAQUAVIT INMUEBLES, S.L.	56.8
BIOINGENIERIA ARAGONESA, S.L.	60.0
PROVITAE CENTROS ASISTENCIALES, S.L.	50.0
FANCY INVESTMENT S.A.	100.0
CENTRO INTERNACIONAL DE FORMACION DE DIRECTIVOS S.A.	100.0

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
Members														
							FUNDACION MAPFRE.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							CARTERA MAPFRE, S.L.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							MAPFRE, S.A.....	ESP.....	UIP.....	CARTERA MAPFRE, S.L.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							POLICLINICO SALUD 4, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MULTISERVICAR.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE GESTION DE FLOTAS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE MULTICENTRO DEL AUTOMOVIL, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							BUSINESS LAB VENTURES, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...97.500	MAPFRE S.A.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...78.500	MAPFRE S.A.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...14.700	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESAS.....	OWNERSHIP....	...25.000	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...25.000	MAPFRE S.A.....	
							DISENO URBANO, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	

Q12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							FINLOG-ALUGUER E COMERCIO DE AUTOMOVEIS, S.A.	PRT.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							CATALUNYA CAIXA ASSEGURANCES GENERALS	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							AUTOMOCION PENINSULAR INMUEBLES, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ONLINE SHOPPING CLUB EUROPE, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	49.900	MAPFRE S.A.....	
							BANKINTER SEGUROS GENERALES, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	25.100	MAPFRE S.A.....	
							BANKINTER SEGUROS GENERALES, S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESAS.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							RESTREATOR.COM LTD.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	22.500	MAPFRE S.A.....	
							AUDATEX ESPANA, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	12.500	MAPFRE S.A.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	16.400	MAPFRE S.A.....	
							FUNESPANA, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	63.800	MAPFRE S.A.....	
							FUNERARIA PEDROLA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNEBALEAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUENMALAGA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS EMPRESAS MORTUORIAS PONTEVEDRESAS, S.A.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.1

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							KEGYELET TEMETKEZESI SZOLGALAT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIUM ZRT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ALL FUNERAL SERVICES, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA CRESPO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIO SAN ALBERTO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNEGRUP, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SALZILLO SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	76.000	MAPFRE S.A.....	
							SERVICIOS Y GESTION FUNERARIA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS EL CARMEN, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA GIMENO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA SANTO ROSTRO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI ALACANT, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI BENIDORM, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIO DE ARANJUEZ, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI LA DAMA D'ELX, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	97.100	MAPFRE S.A.....	
							ZACARIAS NUNO, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							FUNERARIA TERRASA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.....	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP.....	65.200	MAPFRE S.A.....	
							CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.....	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							FUNETXEA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA SARRIA, S.A.....	ESP.....	NIA.....	FUNETXEA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	70.000	MAPFRE S.A.....	
							FUNERARIA ZETA ORBITAL, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA VALLE DEL EBRO, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INICIATIVAS ALCAESAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	64.900	MAPFRE S.A.....	
							ALCAESAR FUNERHERVAS, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ALCAESAR FUNERCORIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERTRUJILLO, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	30.000	MAPFRE S.A.....	
							ALCAESAR FUNERPLASENCIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							NUEVO TANATORIO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							NUEVOS SERVICIOS FUNERARIOS, S.L.....	ESP.....	NIA.....	NUEVO TANATORIO, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	

Q12.2

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							TANATORIO Y CEMENTERIO DE SANLUCAR, S.L.	ESP.....	NIA.....	SERVICIOS FUNERARIOS LA CARIDAD, S.L.	OWNERSHIP.....	75.000	MAPFRE S.A.....	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							GESTION DE CEMENTERIS DE TARRAGONA....	ESP.....	NIA.....	EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							GAB MANAGEMENT & CONSULTING, S.R.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	77.600	MAPFRE S.A.....	
							POMPAS FUNEBRES DOMINGO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	75.000	MAPFRE S.A.....	
							DE MENA SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	70.000	MAPFRE S.A.....	
							CEMENTERIO PARQUE ANDUJAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	
							FUNBIERZO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	67.500	MAPFRE S.A.....	
							FUNERARIA HISPALENSE, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ISABELO ALVAREZ MAYORGA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS DEL NERVION, S.L...	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							EMPRESA MIXTA SERVICIOS FUNERARIOS DE MADRID, S.A.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							TANATORIO DE ECIJA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							TANATORIO SE-30 SEVILLA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							HIJOS DE LUIS SANTOS, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIAS REUNIDAS DEL BIERZO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	66.000	MAPFRE S.A.....	
							FUNERARIAS REUNIDAS DEL BIERZO, S.A.....	ESP.....	NIA.....	HIJOS DE LUIS SANTOS, S.L.....	OWNERSHIP.....	34.000	MAPFRE S.A.....	
							MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							MIRACETI S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INVERSION DOS SOCIEDAD GESTORA DE INSTITUCIONES DE INVERSION COLECTIVA S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	99.900	MAPFRE S.A.....	

Q12.3

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							MAPFRE CAJA MADRID VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							CATALUNYACAIXA VIDA S.A. D'ASSEGURANCES I	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	91.500	MAPFRE S.A.....	
							INVERSIONES IBERICAS, L.T.D.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							REINSURANCE MANAGEMENT INC.....	USA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE CHILE REASEGUROS, S.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.4

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							C R ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CAJA REASEGURADORA DE CHILE, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							INMOBILIARIA TIRILLUCA S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	43.800	MAPFRE S.A.....	
							INMOBILIARIA COSTA DE MONTEMAR, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.400	MAPFRE S.A.....	
							ADMINISTRADORA DE PROPIEDADES S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.300	MAPFRE S.A.....	
							COMMERCIAL Y TURISMO, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.200	MAPFRE S.A.....	
							MAPFRE MANDATOS Y SERVICIOS, S.A.....	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.....	OWNERSHIP.....	95.000	MAPFRE S.A.....	
							MAPFRE AMERICA, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	99.200	MAPFRE S.A.....	
							MAPFRE ARGENTINA HOLDING.....	ARG.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	96.100	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CESVI ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP.....	65.000	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.....	ARG.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	64.000	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	36.000	MAPFRE S.A.....	
	MAPFRE INSURANCE GROUP.....		66-0781080..				MAPFRE PRAICO CORPORATION.....	PR.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PAN AMERICAN INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	31690..	66-0319465..				MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
							MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PREFERRED RISK INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							CLUB MAPFRE S.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CEFOPROSEG C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INVERSORA SEGURIDAD C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							AUTOMOTRIZ MULTISERVICAR, C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							AMA-ASISTENCIA ADMISTRADA.....	VEN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							MAPFRE CHILE SEGUROS S.A.....	CHL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							EUROAMERICA ASESORIAS GENERALES S.A.....	CHL.....	NIA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.5

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	81.400	MAPFRE S.A.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	EUROAMERICA ASESORIAS GENERALES S.A.	OWNERSHIP.....	18.600	MAPFRE S.A.....	
							MAPFRE CHILE VIDA S.A.....	CHL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INVERSIONES MAPFRE CHILE LIMITADA.....	CHL.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	98.800	MAPFRE S.A.....	
							MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA	OWNERSHIP.....	90.000	MAPFRE S.A.....	
							MAPFRE SAUDE LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	91.700	MAPFRE S.A.....	
							MAPFRE PREVIDENCIA S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGURADORA DE CREDITO A LA EXPORTACION, S.A.	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE CAPITALIZACAO.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE BB SH2 PARTICIPACOES, S.A.....	BRA.....	IA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ALIANCA DO BRASIL SEGUROS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS GERAIS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE AFFINITY SEGURADORA.....	BRA.....	IA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ASSISTENCIA.....	BRA.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BB MAPFRE SH1 PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							MAPFRE VIDA S.A.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VIDA SEGURADORA.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.6

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	COL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	94.300	MAPFRE S.A.....	
							GESTIMAP S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP.....	92.300	MAPFRE S.A.....	
							CREDIMAPFRE.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP.....	94.900	MAPFRE S.A.....	
							AUTOMOTORES CAPITAL LTDA.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COLOMBIA VIDA S.A.....	COL.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	94.400	MAPFRE S.A.....	
							CESVI COLOMBIA, S.A.....	COL.....	IA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP.....	63.900	MAPFRE S.A.....	
							MAPFRE SERVICIOS EXEQUIALES SAS.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	PER.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	67.300	MAPFRE S.A.....	
							CORPORACION FINISTERRE, S.A.....	PER.....	NIA.....	MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	PER.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	PER.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	98.600	MAPFRE S.A.....	
							MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	ECU.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	
							MAPFRE SOFT S.A.....	ESP.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	PRY.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	89.500	MAPFRE S.A.....	
							APOINT S.A.....	URY.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE LA URUGUAYA S.A.....	URY.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE DOMINICANA S.A.....	DOM.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE BHD COMPANIA DE SECUROS, S.A...	DOM.....	IA.....	MAPFRE DOMINICANA S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							CREDI PRIMAS, S.A.....	DOM.....	NIA.....	MAPFRE BHD COMPANIA DE SECUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							GRUPO CORPORATIVO LML S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.7

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	55.700	MAPFRE S.A.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	GRUPO CORPORATIVO LML S.A. DE C.V.....	OWNERSHIP.....	44.300	MAPFRE S.A.....	
							UNIDAD MOVIL DE DIAGNOSTICO S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TEPEYAC INC.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS MEXICANOS.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE FIANZAS S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	78.800	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	16.000	MAPFRE S.A.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	14.000	MAPFRE S.A.....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PANAMA.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	78.900	MAPFRE S.A.....	
							MPF TENEDORA AC, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COSTA RICA.....	CRI.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE GUATEMALA.....	GTM.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE NICARAGUA.....	NIC.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	25.100	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MPF TENEDORA AC, S.A.....	OWNERSHIP.....	73.000	MAPFRE S.A.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-2599931				MAPFRE USA CORPORATION INC.....	MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274	04-2739876				THE CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-3148033				BAY FINANCE HOLDING COMPANY.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INPOP USA, LLC.....	VA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754	04-2495247				THE COMMERCE INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			65-0214501				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932	65-0131982				MAPFRE INSURANCE COMPANY OF FLORIDA.....	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876	36-3347420				MAPFRE INSURANCE COMPANY.....	NJ.....	IA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736	47-2744441				CUBE INSURANCE COMPANY.....	OH.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MM REAL ESTATE, LLC.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-2495247				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.8

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	85561...	51-0137488..				MAPFRE LIFE INSURANCE COMPANY	DE.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TURKIYE GENEL SIGORTA, A.S.....	TUR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							GENEL YASAM SIFORTA, A.S.....	TUR.....	NIA.....	TURKIYE GENEL SIGORTA, A.S.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							GENEL SERVİSYEDEK PARCA DAGITIM TICARET ANONIM SİRKET	TUR.....	NIA.....	TURKIYE GENEL SIGORTA, A.S.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							MAPFRE INSULAR INSURANCE CORPORATION	PHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	74.900	MAPFRE S.A.....	
			05-0501519..				ACIC HOLDINGS COMPANY, INC.....	MA.....	UDP.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	95.000	MAPFRE S.A.....	**
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161...	94-1137122..				THE COMMERCE WEST INSURANCE COMPANY	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941...	31-4361173..				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	25275...	13-1773336..				MAPFRE INSURANCE COMPANY OF NEW YORK	NY.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MIDDLESEA INSURANCE P.L.C.....	MLT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	54.600	MAPFRE S.A.....	
							M.S.V. LIFE P.L.C.....	MLT.....	IA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							BEE INSURANCE MANAGEMENT LTD.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							GROWTH INVESTMENTS LIMITED.....	MLT.....	NIA.....	MSV LIFE P.L.C.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							PT ASURANSI BINA DANA ARTA TBK.....	IND.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	20.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IBERO ASISTENCIA, S.A.....	PRT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VENEASISTENCIA, S.A.....	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IRELAND ASSIST, LTD.....	IRL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MEXICO ASISTENCIA, S.A.....	MEX.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.9

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							FEDERAL ASSIST CO.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							C.I. DE SERVICIOS Y ASIST.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							ALLMAP ASSIST	DEU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							ARABA ASSIST.....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							LLC M. WARRANTY.....	RUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA LIMITED.....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA COMPANY LIMITED.....	TWN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY JAPAN.....	JPN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							INSURE AND GO USA.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							COSTA RICA ASISTENCIA.....	CRI.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							QUETZAL ASISTENCIA, S.A.....	GTM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							NICASSIT, S.A.....	NIC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	

Q12.10

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							EL SALVADOR ASISTENCIA, S.A.....	SLV.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							NORASIST, INC D/B/A ROAD CANADA.....	CAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VIAJES MAPFRE CCI, S.L.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INSURE AND GO AUSTRALIA.....	AUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BRASIL ASISTENCIA S/A.....	BRA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ABRAXAS SOFTWARE, LTD.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY UK LIMITED.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY S.P.A.....	ITA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTIES.....	LUX.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FRANCE ASSIST.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ALLIANCE OPTIMALE, S.L.R.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ASSISTANCE USA INC.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CENTURY AUTOMOTIVE SERVICES COMPANY	NM.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INSURE AND GO.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INSURE AND GO AUSTRALASIA.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.11

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							CIG SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	COL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	94.900	MAPFRE S.A.....	
							ECUASISTENCIA.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	94.500	MAPFRE S.A.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.900	MAPFRE S.A.....	
							CONSULTING DE SERVICIOS Y TECNOLOGIA SIAM, S.A.	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.900	MAPFRE S.A.....	
							IBEROASISTECIA INTERNACIONAL.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.800	MAPFRE S.A.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.600	MAPFRE S.A.....	
							EUROSOS.....	GRC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.500	MAPFRE S.A.....	
							URUGUAY ASISTENCIA.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	94.800	MAPFRE S.A.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.000	MAPFRE S.A.....	
							NILE ASSIT.....	EGY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.000	MAPFRE S.A.....	
							TUR ASSIST.....	TUR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	91.700	MAPFRE S.A.....	
							ROAD CHINA ASSISTANCE CO., LTD.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	60.300	MAPFRE S.A.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	

Q12.12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							ASISTENCIA BOLIVIANA.....	BOL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	74.600	MAPFRE S.A.....	
							CARIBE ASISTENCIA.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	73.700	MAPFRE S.A.....	
							BENELUX ASSIST, S.A.....	BEL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	70.000	MAPFRE S.A.....	
							PANAMA ASISTENCIA.....	PAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	58.000	MAPFRE S.A.....	
							LIB ASSIST.....	LBY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							AFRIQUE ASSISTANCE, S.A.....	TUN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.200	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	26.700	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							INMOBILIARIA MAPINVER S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							MAPFRE GLOBAL RISKS.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INDUSTRIAL RE MUSINI S.A.....	LUX.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS DE CAUCION S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							SOLUNION SERVICIOS DE CREDITO, S.L.U.....	ESP.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.13

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							SOLUNION SERVICIOS DE CREDITO ARGENTINA	ARG.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	95.000	MAPFRE S.A.....	
							MAPFRE AMERICA CAUCION Y CREDITO.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE GARANTIAS Y CREDITO CIA DE SEGUROS, S.A.	CHL.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS DE CREDITO S.A.....	MEX.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ACI HOLDING USA.....	USA.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							EULER HERMES SEGUROS CHILE.....	CHL.....	IA.....	ACI HOLDING USA.....	OWNERSHIP.....	75.400	MAPFRE S.A.....	
							SOLUNION CHILE SERVICIOS.....	CHL.....	NIA.....	ACI HOLDING USA.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							SOLUNION COLUMBIA SERVICIOS.....	COL.....	NIA.....	ACI HOLDING USA.....	OWNERSHIP.....	98.300	MAPFRE S.A.....	
							EULER HERMES SEGUROS MEJICO.....	MEX.....	IA.....	ACI HOLDING USA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SOLUNION MEJICO SERVICIOS.....	MEX.....	NIA.....	ACI HOLDING USA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							COMPANIA DE SEGUROS DE CREDITOS COMERCIALES, S.A.	COL.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	94.900	MAPFRE S.A.....	
							MAPFRE SEGUROS DE EMPRESA.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS MARITIMOS, COMISARIADO Y LIQUIDACION DE AVERIAS, S.A.	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS DE PERITACION MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	96.000	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	33.400	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	33.300	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	33.300	MAPFRE S.A.....	
							AGROSEGURO, S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	20.100	MAPFRE S.A.....	
							ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	
							ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	40.000	MAPFRE S.A.....	
							ITSEMAP BRASIL, LTDA.....	BRA.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP MEXICO, S.A.....	MEX.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP PORTUGAL, LTDA.....	PRT.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	75.000	MAPFRE S.A.....	

Q12.14

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	INVERSIONES IBERICAS.....	OWNERSHIP....	...25.000	MAPFRE S.A.....	
							MAQUAVIT INMUEBLES, S.L.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...56.800	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...40.000	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	...60.000	MAPFRE S.A.....	
							PROVITAE CENTROS ASISTENCIALES, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							FANCY INVESTMENT S.A.....	URY.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CENTRO INTERNACIONAL DE FORMACION DE DIRECTIVOS S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	

Asterisk	Explanation
*	All subsidiaries of MAPFRE PRAICO Corporation are 100% owned by their parent companies, except MAPFRE Preferred Risk Insurance Company which is 100% owned by MAPFRE PRAICO Insurance Company.
**	All subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies, except ACIC Holding Co., Inc., which is 5% owned by AAA Southern New England and 0.06% owned by AAA Ohio Auto Club and AAA Oregon/Idaho each.

Q12.15

American Commerce Insurance Company PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	2,711,185	1,158,718	42.7	47.2
2. Allied lines.....	65,004	30,969	47.6	70.0
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	74,514,275	55,053,221	73.9	65.7
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	1,526,574	1,374,041	90.0	70.6
10. Financial guaranty.....			0.0	
11.1. Medical professional liability - occurrence.....			0.0	
11.2. Medical professional liability - claims-made.....			0.0	
12. Earthquake.....			0.0	
13. Group accident and health.....	98,937	81,336	82.2	90.4
14. Credit accident and health.....			0.0	
15. Other accident and health.....			0.0	
16. Workers' compensation.....			0.0	
17.1. Other liability-occurrence.....	3,892,133	17,366	0.4	0.4
17.2. Other liability-claims made.....			0.0	
17.3. Excess workers' compensation.....			0.0	
18.1. Products liability-occurrence.....			0.0	
18.2. Products liability-claims made.....			0.0	
19.1, 19.2. Private passenger auto liability.....	86,481,507	74,787,071	86.5	80.8
19.3, 19.4. Commercial auto liability.....			0.0	
21. Auto physical damage.....	50,412,461	31,812,149	63.1	59.7
22. Aircraft (all perils).....	7,490,266	3,564,256	47.6	(118.2)
23. Fidelity.....			0.0	
24. Surety.....			0.0	
26. Burglary and theft.....			0.0	
27. Boiler and machinery.....			0.0	
28. Credit.....			0.0	
29. International.....			0.0	
30. Warranty.....			0.0	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	192,981	220,691	114.4	172.3
35. Totals.....	227,385,323	168,099,818	73.9	69.2
DETAILS OF WRITE-INS				
3401. TRAVEL.....	192,981	220,691	114.4	172.3
3402.			0.0	
3403.			0.0	
3498. Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0.0	XXX
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	192,981	220,691	114.4	172.3

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1	2	3
	Current Quarter	Current Year to Date	Prior Year Year to Date
1. Fire.....	2,986,169	5,903,746	1,941,109
2. Allied lines.....	24,276	65,684	61,219
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	36,911,686	92,968,583	71,250,966
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	836,659	1,973,913	658,720
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....	44,763	120,918	65,136
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	3,444,963	9,997,158	8,945,851
17.2. Other liability-claims made.....			
17.3. Excess workers' compensation.....			
18.1. Products liability-occurrence.....			
18.2. Products liability-claims made.....			
19.1 19.2. Private passenger auto liability.....	35,345,387	97,764,920	89,036,202
19.3 19.4. Commercial auto liability.....			
21. Auto physical damage.....	21,812,007	58,831,441	49,822,363
22. Aircraft (all perils).....	2,969,333	8,005,144	3,292,365
23. Fidelity.....			
24. Surety.....			
26. Burglary and theft.....			
27. Boiler and machinery.....			
28. Credit.....			
29. International.....			
30. Warranty.....			
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	95,552	231,187	118,607
35. Totals.....	104,470,795	275,862,694	225,192,538
DETAILS OF WRITE-INS			
3401. TRAVEL.....	95,552	231,187	118,607
3402.			
3403.			
3498. Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	95,552	231,187	118,607

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

	1	2	3	4	5	6	7	8	9	10	11	12	13
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year-End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1 + 2)	2015 Loss and LAE Payments on Claims Reported as of Prior Year-End	2015 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2015 Loss and LAE Payments (Cols. 4 + 5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year-End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year-End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols. 7 + 8 + 9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 4 + 7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 5 + 8 + 9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/Deficiency (Cols. 11 + 12)
1. 2012 + Prior.....	24,887	(4,978)	19,909	7,890	101	7,991	15,290	163	(3,555)	11,898	(1,707)	1,687	(20)
2. 2013.....	19,047	(331)	18,716	6,853	222	7,075	13,079	119	(1,647)	11,551	885	(975)	(90)
3. Subtotals 2013 + Prior.....	43,934	(5,309)	38,625	14,743	323	15,066	28,369	282	(5,202)	23,449	(822)	712	(110)
4. 2014.....	33,694	10,540	44,234	18,620	3,823	22,443	22,672	358	52	23,082	7,598	(6,307)	1,291
5. Subtotals 2014 + Prior.....	77,628	5,231	82,859	33,363	4,146	37,509	51,041	640	(5,150)	46,531	6,776	(5,595)	1,181
6. 2015.....	XXX	XXX	XXX	XXX	78,519	78,519	XXX	30,024	11,076	41,100	XXX	XXX	XXX
7. Totals.....	77,628	5,231	82,859	33,363	82,665	116,028	51,041	30,664	5,926	87,631	6,776	(5,595)	1,181
8. Prior Year-End's Surplus As Regards Policyholders	103,684										Col. 11, Line 7 As % of Col. 1, Line 7	Col. 12, Line 7 As % of Col. 2, Line 7	Col. 13, Line 7 As % of Col. 3, Line 7
											1.8.7 %	2.(107.0)%	3.1.4 %
													Col. 13, Line 7 Line 8
													4.1.1 %

Q14

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason, enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?	NO
2. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed with this statement?	NO
3. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC with this statement?	NO
4. Will the Director and Officer Supplement be filed with the state of domicile and the NAIC with this statement?	NO

Explanation:

- 1.
- 2.
- 3.
- 4.

Bar Code:



Statement for September 30, 2015 of the **American Commerce Insurance Company**
Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4 December 31, Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. Miscellaneous assets.....	1,641		1,641	4,016
2505. Premium tax receivable	543,666		543,666	
2597. Summary of remaining write-ins for Line 25.....	545,307	0	545,307	4,016

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Other Non-technical income.....			2,500
1497. Summary of remaining write-ins for Line 14.....	0	0	2,500

American Commerce Insurance Company
SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,502,792	1,594,549
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....	75,879	44,089
3. Current year change in encumbrances.....		
4. Total gain (loss) on disposals.....		
5. Deduct amounts received on disposals.....		
6. Total foreign exchange change in book/adjusted carrying value.....		
7. Deduct current year's other than temporary impairment recognized.....		
8. Deduct current year's depreciation.....	97,942	135,846
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,480,729	1,502,792
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,480,729	1,502,792

SCHEDULE B - VERIFICATION

Mortgage Loans

	1 Year to Date	2 Prior Year Ended December 31
1. Book value/recorded investment excluding accrued interest, December 31 of prior year.....	0	
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		
3. Capitalized deferred interest and other.....		
4. Accrual of discount.....		
5. Unrealized valuation increase (decrease).....		
6. Total gain (loss) on disposals.....		
7. Deduct amounts received on disposals.....		
8. Deduct amortization of premium and mortgage interest points and commitment fees.....		
9. Total foreign exchange change in book value/recorded investment excluding accrued interest.....		
10. Deduct current year's other than temporary impairment recognized.....		
11. Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10).....	0	0
12. Total valuation allowance.....		
13. Subtotal (Line 11 plus Line 12).....	0	0
14. Deduct total nonadmitted amounts.....		
15. Statement value at end of current period (Line 13 minus Line 14).....	0	0

NONE

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	0	
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		
3. Capitalized deferred interest and other.....		
4. Accrual of discount.....		
5. Unrealized valuation increase (decrease).....		
6. Total gain (loss) on disposals.....		
7. Deduct amounts received on disposals.....		
8. Deduct amortization of premium and depreciation.....		
9. Total foreign exchange change in book/adjusted carrying value.....		
10. Deduct current year's other than temporary impairment recognized.....		
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10).....	0	0
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	0	0

NONE

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	153,599,950	157,693,327
2. Cost of bonds and stocks acquired.....	41,575,990	50,937,045
3. Accrual of discount.....	271,445	441,431
4. Unrealized valuation increase (decrease).....	(532,371)	(758,733)
5. Total gain (loss) on disposals.....	1,259,732	3,282,488
6. Deduct consideration for bonds and stocks disposed of.....	58,716,700	57,363,507
7. Deduct amortization of premium.....	514,140	632,101
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other than temporary impairment recognized.....		
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	136,943,906	153,599,950
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	136,943,906	153,599,950

SCHEDULE D - PART 1B

Showing the Acquisitions, Dispositions and Non-Trading Activity
During the Current Quarter for all Bonds and Preferred Stock by NAIC Designation

	1	2	3	4	5	6	7	8
NAIC Designation	Book/Adjusted Carrying Value Beginning of Current Quarter	Acquisitions During Current Quarter	Dispositions During Current Quarter	Non-Trading Activity During Current Quarter	Book/Adjusted Carrying Value End of First Quarter	Book/Adjusted Carrying Value End of Second Quarter	Book/Adjusted Carrying Value End of Third Quarter	Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	126,997,560	13,771,576	29,209,692	(69,811)	134,218,022	126,997,560	111,489,633	125,878,566
2. NAIC 2 (a).....	25,079,989		2,068,394	(1,025,460)	31,181,413	25,079,989	21,986,135	24,008,242
3. NAIC 3 (a).....				880,000			880,000	1,329,000
4. NAIC 4 (a).....	68,237		3,984	(415)	1,401,723	68,237	63,838	71,442
5. NAIC 5 (a).....	957,600			(957,600)		957,600	0	
6. NAIC 6 (a).....				1,050,000			1,050,000	
7. Total Bonds.....	153,103,386	13,771,576	31,282,070	(123,286)	166,801,158	153,103,386	135,469,606	151,287,250
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....	753,600			(1,800)	763,501	753,600	751,800	1,577,700
10. NAIC 3.....	761,250			(38,750)	775,000	761,250	722,500	735,000
11. NAIC 4.....							0	
12. NAIC 5.....							0	
13. NAIC 6.....							0	
14. Total Preferred Stock.....	1,514,850	0	0	(40,550)	1,538,501	1,514,850	1,474,300	2,312,700
15. Total Bonds and Preferred Stock.....	154,618,236	13,771,576	31,282,070	(163,836)	168,339,659	154,618,236	136,943,906	153,599,950

QS102

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of non-rated short-term and cash equivalent bonds by NAIC designation:

NAIC 1 \$.....0; NAIC 2 \$.....0; NAIC 3 \$.....0; NAIC 4 \$.....0; NAIC 5 \$.....0; NAIC 6 \$.....0.

**Sch. DA-Pt 1
NONE**

**Sch. DA-Verification
NONE**

**Sch. DB-Pt A-Verification
NONE**

**Sch. DB-Pt B-Verification
NONE**

**Sch. DB-Pt C-Sn 1
NONE**

**Sch. DB-Pt C-Sn 2
NONE**

**Sch. DB-Verification
NONE**

**Sch. E-Verification
NONE**

SCHEDULE A - PART 2

Showing all Real Estate ACQUIRED AND ADDITIONS MADE During the Current Quarter

1 Description of Property	Location		4 Date Acquired	5 Name of Vendor	6 Actual Cost at Time of Acquisition	7 Amount of Encumbrances	8 Book/Adjusted Carrying Value Less Encumbrances	9 Additional Investment Made After Acquisition
	2 City	3 State						
Acquired by Purchase								
ADDITIONS TO: THREE STORY BUILDING, 37,077 SQUARE FEET, LOCATED ON 6.002 ACRES OF LAND ON FOUR SEPARATE PARCELS	COLUMBUS	OH	09/30/2015	VARIOUS			1,480,729	69,822
0199999. Totals					0	0	1,480,729	69,822
0399999. Totals					0	0	1,480,729	69,822

QE01

SCHEDULE A - PART 3

Showing all Real Estate DISPOSED During the Quarter, Including Payments During the Final Year on "Sales Under Contract "

1 Description of Property	Location		4 Disposal Date	5 Name of Purchaser	6 Actual Cost	7 Expended for Additions, Permanent Improvements and Changes in Encumbrances	8 Book/Adjusted Carrying Value Less Encumbrances Prior Year	Change in Book/Adjusted Carrying Value Less Encumbrances					14 Book/Adjusted Carrying Value Less Encumbrances on Disposal	15 Amounts Received During Year	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal	19 Gross Income Earned Less Interest Incurred on Encumbrances	20 Taxes, Repairs, and Expenses Incurred
	2 City	3 State						9 Current Year's Depreciation	10 Current Year's Other Than Temporary Impairment Recognized	11 Current Year's Change in Encumbrances	12 Total Change in B./A.C.V. (11 - 9 - 10)	13 Total Foreign Exchange Change in B./A.C.V.							
NONE																			

**Sch. B-Pt 2
NONE**

**Sch. B-Pt 3
NONE**

**Sch. BA-Pt 2
NONE**

**Sch. BA-Pt 3
NONE**

SCHEDULE D - PART 3

Show all Long-Term Bonds and Stock Acquired During the Current Quarter

1 Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Number of Shares of Stock	7 Actual Cost	8 Par Value	9 Paid for Accrued Interest and Dividends	10 NAIC Designation or Market Indicator (a)
Bonds - U.S. Government									
912828 VJ 6	U.S. TREASURY NOTE.....		07/22/2015	RW PRESSPRICH & CO.....		792,666	785,000	920	1.....
0599999	Total Bonds - U.S. Government.....								XXX
Bonds - U.S. States, Territories and Possessions									
68608K 5L 8	OREGON ST.....		08/06/2015	DEUTSCHE BANK.....		1,138,700	1,000,000	1,389	1FE.....
93974C PJ 3	WASHINGTON ST.....		08/03/2015	BAIRD, ROBERT W. & CO.....		1,135,500	1,000,000	651	1FE.....
1799999	Total Bonds - U.S. States, Territories and Possessions.....								XXX
Bonds - U.S. Political Subdivisions of States, Territories and Possessions									
751120 AJ 5	RALEIGH N C LTD OBLIG.....		09/24/2015	RAYMOND JAMES.....		1,090,400	1,000,000	18,264	1FE.....
2499999	Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....								XXX
Bonds - U.S. Special Revenue and Special Assessment									
3130A5 P4 5	FEDERAL HOME LOAN BANK.....		07/29/2015	RAYMOND JAMES.....		1,007,700	1,000,000	3,167	1.....
3199999	Total Bonds - U.S. Special Revenue and Special Assessment.....								XXX
Bonds - Industrial and Miscellaneous									
53944V AH 2	LLOYDS BANK PLC.....	F.....	07/31/2015	DEUTSCHE BANK.....		991,950	1,000,000	7,875	1FE.....
06051G EH 8	BANK OF AMERICA CORP.....		07/28/2015	DEUTSCHE BANK.....		1,647,270	1,500,000	16,250	1FE.....
30231G AF 9	EXXON MOBIL CORP.....		08/13/2015	PIERPONT SECURITIES.....		967,000	1,000,000	12,191	1FE.....
55279H AK 6	MANUFACTURER AND TRADERS.....		08/04/2015	GOLDMAN SACHS.....		957,350	1,000,000	81	1FE.....
69349L AG 3	PNC BK NA.....		08/04/2015	GOLDMAN SACHS.....		966,970	1,000,000	7,200	1FE.....
911312 AM 8	UNITED PARCEL SERVICE INC.....		08/03/2015	BAIRD, ROBERT W. & CO.....		1,035,010	1,000,000	1,823	1FE.....
91324P CP 5	UNITEDHEALTH GROUP INC.....		09/30/2015	Merrill Bos.....		1,035,030	1,000,000	7,500	1FE.....
94974B GM 6	WELLS FARGO & COMPANY.....		07/31/2015	PIERPONT SECURITIES.....		1,006,030	1,000,000	939	1FE.....
3899999	Total Bonds - Industrial and Miscellaneous.....								XXX
8399997	Total Bonds - Part 3.....								XXX
8399999	Total Bonds.....								XXX
9999999	Total Bonds, Preferred and Common Stocks.....								XXX

QE04

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues:.....0.

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2	3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation or Market Indicator (a)
Bonds - U.S. Government																					
36225B	GW 2		09/15/2015	GNMA POOL #0781113.....		4,223	4,223	4,378	4,339		(3)		(3)		4,335		(112)	(112)	203	11/15/2029	1.....
83162C	TA 1		07/01/2015	SMALL BUS ADMIN GTD DEV PTC.....		335,168	335,168	369,889	367,650		(32,482)		(32,482)		335,168			0	7,616	01/01/2030	1.....
911759	EA 2		08/03/2015	U S DEPT HSG & URBAN DEV GOVT.....		230,000	230,000	238,671	230,000				0		230,000			0	18,073	08/01/2016	1.....
912828	EE 6		08/17/2015	U.S. TREASURY NOTE.....		805,000	805,000	794,589	804,178		822		822		805,000			0	34,213	08/15/2015	1.....
0599999. Total Bonds - U.S. Government.....						1,374,391	1,374,391	1,407,527	1,406,167	0	(31,663)	0	(31,663)	0	1,374,503	0	(112)	(112)	60,105	XXX	XXX
Bonds - U.S. States, Territories and Possessions																					
93974C	PJ 3		08/03/2015	WASHINGTON ST.....		1,134,730	1,000,000	1,057,950	1,041,645		(2,419)		(2,419)		1,039,226		95,504	95,504	47,511	08/01/2023	1FE.....
1799999. Total Bonds - U.S. States, Territories and Possessions.....						1,134,730	1,000,000	1,057,950	1,041,645	0	(2,419)	0	(2,419)	0	1,039,226	0	95,504	95,504	47,511	XXX	XXX
Bonds - U.S. Political Subdivisions of States, Territories and Possessions																					
546585	EB 2		08/19/2015	LOUISVILLE & JEFFERSON CNTY KY G O.....		2,325,960	2,000,000	1,987,750	1,990,651		413		413		1,991,064		334,896	334,896	79,825	11/15/2025	1FE.....
751120	AJ 5		09/24/2015	RALEIGH N C LTD OBLIG.....		1,090,000	1,000,000	1,057,000	1,040,515		(4,882)		(4,882)		1,035,633		54,367	54,367	46,124	06/01/2035	1FE.....
2499999. Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....						3,415,960	3,000,000	3,044,750	3,031,166	0	(4,469)	0	(4,469)	0	3,026,697	0	389,263	389,263	125,949	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																					
23410B	AB 7		09/01/2015	DAKOTA CNTY MINN CMNTY DEV AGY.....		18,433	18,433	19,170	18,710		(38)		(38)		18,672		(239)	(239)	530	12/01/2038	1FE.....
31396P	GT 2		09/25/2015	FANNIE MAE - ACES.....		8,206	8,206	9,180	8,923		(717)		(717)		8,206			0	288	10/25/2032	1.....
313383	ML 2		08/05/2015	FED HOME LN BANK.....		2,000,000	2,000,000	2,000,000	2,000,000				0		2,000,000			0	26,767	06/26/2020	1.....
3137AU	XX 2		09/15/2015	FEDERAL HOME LN MTG COR REMIC.....		19,092	19,092	19,534	19,518		(425)		(425)		19,092			0	382	05/15/2029	1.....
3130A5	P4 5		09/21/2015	FEDERAL HOME LOAN BANK.....		1,014,420	1,000,000	1,007,700			(150)		(150)		1,007,550		6,870	6,870	6,597	06/10/2022	1.....
3136A7	DJ 8		09/25/2015	FEDERAL NATL MTG ASSN REMIC TR.....		98,427	98,427	98,042	98,001		426		426		98,427			0	1,830	01/25/2042	1.....
3137B7	R7 6		09/15/2015	FHLMC REMIC SERIES 4298.....		123,232	123,232	124,926	124,717		(1,485)		(1,485)		123,232			0	3,388	02/15/2054	1.....
3137BD	3T 1		09/15/2015	FHLMC REMIC SERIES 4379.....		31,436	31,436	33,086	33,018		(1,582)		(1,582)		31,436			0	734	08/15/2027	1.....
3137AM	CQ 8		08/24/2015	FHR 3997 PB.....		3,285,000	3,000,000	3,330,000	3,272,534		(14,389)		(14,389)		3,258,145		26,855	26,855	88,667	02/15/2042	1.....
31403D	GP 8		09/25/2015	FNMA PASS-THRU PL#745506.....		758,122	758,122	816,995	764,651		(6,529)		(6,529)		758,122			0	29,426	02/01/2016	1.....
3138EK	VT 9		08/25/2015	FNMA PASS-THRU PL#AL3325.....		4,304,042	4,070,580	4,341,846	4,317,173		(15,452)		(15,452)		4,301,721		2,321	2,321	105,144	03/01/2033	1.....
31418A	L5 5		09/25/2015	FNMA PASS-THRU PL#MA1247.....		35,273	35,273	37,147	37,052		(1,780)		(1,780)		35,273			0	705	11/01/2042	1.....
3136AA	JH 9		09/25/2015	FNR 2012- 135 CA.....		110,409	110,409	110,220	110,234		176		176		110,409			0	1,468	11/25/2039	1.....
31395Q	CY 4		09/25/2015	FNS 411 A3.....		103,764	103,764	108,823	108,450		(4,686)		(4,686)		103,764			0	2,034	08/25/2042	1.....
373539	QP 3		08/25/2015	GEORGIA ST HSG & FIN AUTH REV.....		2,020,000	2,000,000	2,012,000	2,005,332		(1,753)		(1,753)		2,003,579		16,421	16,421	71,672	12/01/2037	1FE.....
762212	6Q 6		08/25/2015	RI HSG HMOWNRSHIP 55B RI.....		2,010,000	2,000,000	2,000,000	2,000,000				0		2,000,000		10,000	10,000	86,028	10/01/2037	1FE.....
917436	YR 2		07/01/2015	UTAH HSG CORP SINGLE FAMILY.....		840,000	840,000	853,868	842,008		(991)		(991)		841,017		(1,017)	(1,017)	44,940	01/01/2036	1FE.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....						16,779,856	16,216,974	16,922,537	15,760,321	0	(49,375)	0	(49,375)	0	16,718,645	0	61,211	61,211	470,600	XXX	XXX
Bonds - Industrial and Miscellaneous																					
902118	BP 2		07/06/2015	TYCO INTL FINANCE.....	F...	1,030,000	1,000,000	1,004,820	1,002,344		(378)		(378)		1,001,966		28,034	28,034	36,875	01/15/2018	1FE.....
084423	AQ 5		09/14/2015	BERKLEY W R CORP.....		1,181,250	1,000,000	1,102,640	1,059,381		(7,885)		(7,885)		1,051,496		129,754	129,754	74,160	09/15/2019	2FE.....
12667F	VD 4		09/25/2015	CWALT INC 2004-J10.....		13,370	13,370	13,169	13,222		148		148		13,370			0	514	10/25/2019	1FM.....
29364L	AT 9		09/14/2015	ENTERGY GULF STS INC.....		1,000,000	1,000,000	1,000,000	1,000,000				0		1,000,000			0	64,547	03/01/2035	1FE.....

QE05

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2	3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	For eign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation or Market Indicator (a)
46625H HS 2	JPMORGAN CHASE.....		07/27/2015	RAYMOND JAMES.....		1,613,745	1,500,000	1,630,845	1,622,362		(11,745)		(11,745)		1,610,617		3,128	3,128	67,467	07/22/2020	1FE.....
590218 AF 0	ML MTG INV TR 2006-F1.....		09/25/2015	VARIOUS.....		3,856	3,976	3,961	3,747	217	21		238		3,984		(128)	(128)	154	04/25/2036	4FM.....
718546 AC 8	PHILLIPS 66.....		09/14/2015	PIERPONT SECURITIES.....		1,048,000	1,000,000	1,022,524	1,018,467		(1,568)		(1,568)		1,016,898		31,102	31,102	41,328	04/01/2022	2FE.....
863667 AF 8	STRYKER CORP.....		07/28/2015	BAIRD, ROBERT W. & CO.....		1,502,967	1,500,000	1,491,420	1,491,842		429		429		1,492,271		10,696	10,696	36,000	05/15/2024	1FE.....
92976G AA 9	WACHOVIA BK NATL ASSN MTN.....		08/17/2015	MATURITY.....		1,000,000	1,000,000	1,057,210	1,007,183		(7,183)		(7,183)		1,000,000			0	50,000	08/15/2015	1FE.....
3899999. Total Bonds - Industrial and Miscellaneous.....						8,393,188	8,017,346	8,326,589	8,218,548	217	(28,161)	0	(27,944)	0	8,190,602	0	202,586	202,586	371,045	XXX	XXX
Bonds - Hybrid Securities																					
66644P AA 5	NORTHGROUP PFD CAP CORP.....		09/22/2015	STIFEL, NICHOLAUS & CO.....		1,023,000	1,000,000	930,000	932,018		379		379		932,397		90,603	90,603	60,237	01/15/2049	1AM.....
4899999. Total Bonds - Hybrid Securities.....						1,023,000	1,000,000	930,000	932,018	0	379	0	379	0	932,397	0	90,603	90,603	60,237	XXX	XXX
8399997. Total Bonds - Part 4.....						32,121,125	30,608,711	31,689,353	30,389,865	217	(115,708)	0	(115,491)	0	31,282,070	0	839,055	839,055	1,135,447	XXX	XXX
8399999. Total Bonds.....						32,121,125	30,608,711	31,689,353	30,389,865	217	(115,708)	0	(115,491)	0	31,282,070	0	839,055	839,055	1,135,447	XXX	XXX
9999999. Total Bonds, Preferred and Common Stocks.....						32,121,125	XXX	31,689,353	30,389,865	217	(115,708)	0	(115,491)	0	31,282,070	0	839,055	839,055	1,135,447	XXX	XXX

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues:.....0.

QE05.1

**Sch. DB-Pt A-Sn 1
NONE**

**Sch. DB-Pt B-Sn 1
NONE**

**Sch. DB-Pt D-Sn 1
NONE**

**Sch. DB-Pt D-Sn 2
NONE**

**Sch. DL-Pt. 1
NONE**

**Sch. DL-Pt. 2
NONE**

Statement for September 30, 2015 of the **American Commerce Insurance Company**
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *	
					6 First Month	7 Second Month	8 Third Month		
Open Depositories									
Bank of America.....	100 Federal Street, Boston, MA 02110.....					(7,144,518)	(8,460,643)	(8,649,581)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....		0.010	9		939,520	100,272	100,759	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....					3,366,021	2,234,617	2,287,574	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....					250,432	417,201	298,681	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....		0.010			343	343	343	XXX
MM: Fed Gov'n't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....		0.010			5,561	5,561	5,561	XXX
MM: Fidelity Gov'n't 057.....	500 Salem Street, Smithfield, RI 02917.....		0.010	133		3,934,761	3,874,173	2,715,463	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....					117,568	318,100	93,695	XXX
0199999. Total Open Depositories.....	XXX	XXX		142	0	1,469,688	(1,510,376)	(3,147,505)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX		142	0	1,469,688	(1,510,376)	(3,147,505)	XXX
0599999. Total Cash.....	XXX	XXX		142	0	1,469,688	(1,510,376)	(3,147,505)	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1 Description	2 Code	3 Date Acquired	4 Rate of Interest	5 Maturity Date	6 Book/Adjusted Carrying Value	7 Amount of Interest Due & Accrued	8 Amount Received During Year
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NONE